

# CITY OF NAPA GENERAL PLAN

*DECEMBER 8, 1997*

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## RESPONSE TO COMMENTS ON 10/1/96 DRAFT ENVIRONMENTAL IMPACT REPORT

State Clearinghouse #95-03-3060



**CITY OF NAPA GENERAL PLAN**

*ENVISION NAPA 2020*

**DRAFT GENERAL PLAN/DRAFT EIR  
COMMENTS  
AND  
RESPONSES TO COMMENTS**

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and

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*December 8, 1997*







# Response to Comments

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## **PREFACE**

This is the Response to Comments Document prepared to answer comments and questions submitted on the Draft General Plan Documents and the General Plan Draft Environmental Impact Report (Released 10/1/96). The City has prepared this comprehensive set of responses as a result of the extensive comments submitted on the first Draft EIR (DEIR) and on the Draft General Plan Documents. Although not required, this document contains responses prepared for non-CEQA comments on the Draft General Plan as well as comments related to environmental concerns. As a result of this process, the City has revised sections of the DEIR in order to more accurately reflect the discussion of details in the Response Document and to incorporate changes to the project description contained in Addenda which have been prepared for the Draft General Plan. The Revised Draft EIR (RDEIR), along with the Response to Comment Document and General Plan Addenda, is recirculated for public review pursuant to Section 15088.5 of the State CEQA Guidelines. The Response to Comments Document is considered a part of the Revised DEIR and is included by reference. The Addenda to the General Plan Policy Document recommend changes to the Policy Document to improve accuracy and enhance the mitigating ability of certain policies. In order to avoid the confusion and the sense of a “moving target” that could result from revisions to the Draft General Plan Document, the draft document has been left unchanged and in the form of its August 1996 release. Recommended changes to the Policy Document are described under specific subject headings in the Addenda. Although the Revised DEIR, the Response to Comments and the Addenda have been bound separately, the information is interconnected and the documents should be read in concert. All three documents have been circulated and made available simultaneously for public review along with the Draft General Plan Documents originally released in 1996.

Please contact the City of Napa Planning Department, 1600 First Street, Napa, CA -- (707) 257-9530, if you wish to obtain any of the documents described above.

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# INTRODUCTION

## EIR Review Process

The State CEQA Guidelines requires that agencies preparing EIRs “provide adequate time for other public agencies and members of the public to review and comment on a draft EIR” (Section 15203). While the law does not generally define what constitutes adequate time, it does specify that draft EIRs submitted to the State Clearinghouse of the Governor’s Office of Planning and Research should be subjected to a review period of at least 45 days. Section 15025 of the *State CEQA Guidelines* requires that draft EIRs for four classes of projects be submitted to the Clearinghouse:

1. Those for which a state agency is the Lead Agency;
2. Those projects for which a state agency is a Responsible Agency, Trustee Agency, or otherwise has jurisdiction over the project;
3. Projects of statewide, regional, or areawide significance; and
4. Reports prepared pursuant to the requirements of the National Environmental Protection Act (NEPA).

The *Guidelines* (Section 15026)(b)(1)) defines local general plans as projects fitting into the third category above (i.e. projects of statewide, regional, or areawide significance).

The Draft EIR for the Draft City of Napa General Plan was formally released for public review on October 4, 1996, marking the beginning of a 45 day mandatory review period concluding on November 18th. In response to requests made at the DEIR hearings the Planning Commission extended the review period to December 2, 1996, resulting in a total DEIR review period of 60 days.

On October 4, copies of the Draft EIR and other Draft General Plan Documents were sent to 30 organizations and local, state and federal agencies either directly or through the State Clearinghouse. Additional document sets were provided to local organizations such as the Chamber of Commerce, Board of Realtors, etc. Fifteen sets of the Draft General Plan Documents and DEIR were submitted to the State Clearinghouse along with a notice of completion indicating the desired distribution for state agency review. A “Notice of Completion and Availability” of the Draft General Plan and DEIR documents were mailed to 409 individuals who had requested written notice of General Plan availability and proceedings. A display ad was published in the local newspaper notifying the public of document availability and the public review and comment process. Copies of the Draft EIR and General Plan documents were made available for review at the City of Napa Planning Department and at the City/County Library. Copies were also provided for check-out or purchase at the Planning Department.

On November 18, 1996, a notice of extension of the public review period to December 2 was sent to all agencies and parties previously noticed as described above and another display ad regarding the extension was published in the local newspaper; availability of Addenda #1 and # 2 to the Policy Document was included in the notice and copies of the addenda were circulated to agencies for comment. On November 25, the City published an additional notice in the newspaper regarding the availability of two Addenda to the General Plan Policy Document. It should be noted that the addenda had been distributed to the Planning Commission and informally made available to the public in late October 1996.

Although not legally required by CEQA, during the public review period, the Planning Commission held hearings on October 17th and October 24, 1996, to receive input on the Draft EIR. Also during the public review period, the Planning Commission held six study sessions on the General Plan Documents. These study sessions were

noticed and open to the public; and, in most cases, occurred as the last item on a regular Planning Commission Agenda.

By the close of the extended review period on December 2, 1996, the City had received 38 written communications. During the two public hearings on the Draft EIR held on October 17th and October 24th, the City received oral testimony from seven individuals. After the close of the public comment period on December 2nd, the City received three additional written communications. The communications and hearing record constituted a total of 344 separate comments, each requiring a written response.

## Responses to Comments

All written communications were numbered in the order received and logged by the Planning Department. Every distinct, substantive comment in each communication was given a separate number. In this way, every comment is individually coded with the communication number before the decimal and the comment number after the decimal (e.g., letter 2, comment 3 is designated with “2.3”). Comments addressing the Draft EIR were noted with an “E” (e.g., 2.1E), and comments addressing the Draft General Plan Documents were noted with a “G” (e.g., 2.2G). Comments received at the October 17 and October 24 public hearings before the Planning Commission are at the end of the Response to Comments document and are coded using an alphabetical system (A.1E etc.) The response to comment process of CEQA does not require responses to non-environmental comments; however, in the interest of continuity, responses have been provided for both General Plan and DEIR comments.

To minimize repetition in the responses, a set of “standard responses” were prepared for the following subjects:

- CEQA Application to General Plans
- Rural Urban Limit Line (RUL)
- Stanly Ranch
- Big Ranch Specific Plan and EIR
- Transportation
- Wastewater
- Water Supply
- Flood Control

## Recirculation of the Draft EIR

Section 15088.5 of the *State CEQA Guidelines* requires recirculation of the an EIR when significant new information is added to the EIR after the draft has been released for public review. While the City does not feel recirculation of the Draft General Plan EIR is required by the *CEQA Guidelines* in this case, the City has nonetheless revised and recirculated the Draft EIR to:

- Expand the background information concerning several categories of impacts
- Provide more detailed explanation of environmental conclusions
- Reexamine findings of significance for several impacts
- Provide an opportunity for public comment on this additional information.

The City believes recirculation will result in a more informed discussion of the General Plan and ultimately to a more complete set of general plan goals, policies, and implementation measures.

The Draft EIR has been revised in the following ways:

1. A verbatim copy and a summary of all comments received on the Draft General Plan and the Draft EIR during the public review period in the Fall of 1996 and a response to all comments have been added to the Draft EIR.
2. The project description has been revised to:
  - a. Adjust the RUL to include a 5 acre parcel at the northeast corner of Trancas and Silverado Trail and to designate it TC - Tourist Commercial. The subject parcel has been incorporated land under City's jurisdiction since March 1973 and is inside the City's Sphere of Influence. (Addendum #1)
  - b. Designate land outside the proposed RUL as "G" - Greenbelt. This represents a continuation of the designation in the existing General Plan. (Addendum #2)
  - c. Revise the General Plan to reflect the adoption of the Big Ranch Specific Plan in October 1996. These changes involve land use designations, circulation adjustments and minor text references to the status of the Big Ranch Specific Plan. (Addendum #3)
  - d. Eliminate the Sousa Lane roadway connection in transportation project list. (Addendum #4)
3. The text of the Draft EIR has been revised to add or correct descriptive information based on comments on the Draft EIR.
4. Significance criteria for some types of impacts have been revised based on reconsideration and review of other related environmental documents.
5. Findings of Significance for several types of impacts have been revised based on reconsideration and review of other related environmental documents.

The Revised Draft EIR shows changes made to the October 2, 1996, Draft EIR through underline and strike out.

## STANDARD RESPONSES

### STANDARD RESPONSE CEQA APPLICATION TO GENERAL PLANS

City and county general plans, specific plans, facility master plans, and most regulatory actions potentially affecting the physical environment are defined as projects under the California Environmental Quality Act (CEQA) and must be reviewed for their possible environmental consequences.

Planning and land use regulation at the local level in California is organized in hierarchical fashion due to state requirements for consistency. The General Plan is at the top of the hierarchy and virtually all regulatory and capital facility decisions made by the adopting agency must be consistent with the General Plan. The General Plan is the broadest statement of local land use, development, and environmental policy. Specific plans, authorized by state law, are prepared for the systematic implementation of the General Plan. These plans typically focus on a limited geographical territory (e.g. a few acres to square miles) and provide much more development detail for an area than the General Plan. Zoning, subdivision approvals, and other discretionary permits must be consistent with both the General Plan and any applicable specific plan.

CEQA recognizes that environmental analysis needs to be appropriate for the level of policy or type of project being considered. Section 15146 of the State CEQA Guidelines addressed this issue as follows:



## Sec. 15146 Degree of Specificity

*The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.*

- (a) An EIR on a construction project will necessarily be more detailed in the specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy.*
- (b) An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow.*

Recognizing the hierarchical nature of planning and project decision-making, the State CEQA Guidelines provide for use of “program EIRs” and tiering. The Draft EIR on the Draft General Plan was designed as a “program EIR” as explained in the Introduction (page 1-1):

*The purpose of the EIR is to evaluate the environmental impacts of the adoption and implementation of the Draft Napa General Plan. Adoption of the General Plan by itself does not result in land development, additional traffic, or loss of natural resources; however, it enables such development or actions to occur. This EIR, therefore, addresses what may occur as a result of the General Plan adoption. Because this EIR addresses a series of future actions, this EIR is a “program” EIR. The concept of a program EIR was incorporated into the CEQA Guidelines in recognition of the fact that many types of projects that require environmental review are approved over time in a series of actions. The Legislature and the state administrators of CEQA recognized that it would be inefficient to require a new environmental document at each stage of development unless that stage disclosed new facts or environmental considerations not previously studied or analyzed -- in which case those additional effects would be addressed by an additional document. The program EIR allows decision-makers to consider broad policy alternatives and program-wide mitigation measures at a point when the City has greater flexibility to deal with basic problems or cumulative impacts.*

The concept of tiering is also useful. Tiering refers to the concept of a “multi-tiered” approach to preparing EIRs. The first-tier EIR would cover general issues in a broader program oriented analysis. Subsequent tiers would incorporate by reference the general discussion from the broader EIR, while primarily concentrating on the issues specific to the action being evaluated. Tiering is a method to streamline EIR preparation by allowing a lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe [Guidelines Section 15385].

Several commentators raised questions about the relationship of the Draft EIR for the Draft General Plan and the EIR for the Big Ranch Specific Plan and a future EIR for Stanly Ranch.

The Big Ranch EIR was certified and the Big Ranch Specific Plan was adopted October 22, 1996, after the October 4 release of the Draft General Plan and EIR documents. There are differences between the analysis and conclusions of the two EIRs. Some of the differences reflect the perspectives of different EIR preparers. In revising the DEIR for the General Plan, the environmental analysis and significance findings for Water Supply, Wastewater, Agricultural Land and Traffic were reconsidered and were modified.

Stanly Ranch is an important future development area for the City. The Draft General Plan Policy Document (page 1-7) requires that a specific plan be prepared for Stanly Ranch prior to its development. The specific plan will be the vehicle for resolving land use, infrastructure, safety, and open space issues at a detailed level. An EIR is being prepared to assess the environmental impacts of developing Stanly Ranch. The Stanly Ranch EIR will benefit from 1) having a clear project description, and 2) being able to focus on a smaller geographic area (See Standard Response Stanly Ranch).

## **STANDARD RESPONSE RUL**

The Draft General Plan proposes expansion of the RUL in only four areas:

### **State Hospital**

This 387 acre area is the largest area to be added to the RUL and is already within the City's Sphere of Influence, within the service boundary of the Napa Sanitation District and is served by City water. The institutional development on the property is urban in nature and inclusion in the RUL will enable improved coordination for City services (including fire and police) in the future. The Draft General Plan does not assign any new development potential to the State Hospital and assumes that it will continue as an institutional facility.

### **Foster Road Parcel**

This 13 acre parcel of vacant land is bordered by incorporated land on the north, east and south sides. City services are available and the construction or extension of major facilities will not be required to serve the potential low density residential development that is projected to occur there. The RUL currently creates a conspicuous notch excluding this parcel and the proposed adjustment will create a more sensible edge (roughly along the watershed line) between urban and rural uses.

### **Trancas/Big Ranch**

The current RUL boundary between the land on the northeast corner of Big Ranch Road and Trancas Street and the City is the center line of the roadways. The proposed adjustment will place the RUL along the Salvador Channel and its mature line of riparian vegetation which is a better defined, natural boundary and buffer between urban and rural development. This adjustment will encompass an approximately 40-acre site.

### **Trancas/Silverado Trail**

This vacant approximately 5-acre site is located at the northeast corner of Trancas and Silverado Trail. This parcel has been incorporated land under the City's jurisdiction since 1973; it falls within Napa's Sphere of Influence; but it is outside Napa Sanitation District's Service Boundary. As a result of a lawsuit that followed a complex documentation process involving adjacent land, a superior court decision re-confirmed that this property is part of the City of Napa. Placing the RUL around this parcel allows for the RUL policies for properties adjacent to agricultural and open space lands to be applied to development of this parcel.

The Citizens Advisory Committee (CAC) received and considered several requests to include property within the RUL during their sessions in 1993. Several alternative scenarios for land use were examined and the CAC's Concept Report, including their preferred scenario, was presented to the City Council in late 1993. The City Council considered the information in the Concept Report, including the possibility of moving the RUL in several locations (to a greater degree than shown in the Draft Plan). The Council clearly expressed a desire to maintain the integrity of the RUL as a defensible boundary for city growth. On January 25, 1994 they confirmed the plan area that is presented in the draft documents as the RUL scenario that General Plan preparation should be based on. At that meeting, staff clarified the locations of RUL change that had resulted from prior discussions and the Council agreed that the proposed criteria for making these adjustments were logical and created a more defensible line based upon the natural boundaries such as ridges, drainage areas, creeks etc. The inclusion of the first three of the new areas reflects the land use scenario set out in the General Plan Concept Report. City Council endorsement



of this report provided the basis policy direction for the Draft General Plan. The fourth new area was added by the General Plan Draft Policy Document Addendum #1, released in November 1996. Inclusion of this parcel resolves inconsistencies between the RUL, the city limits, and Sphere of Influence.

First, the City does not consider the minor adjustments to the RUL proposed in the Draft General Plan to be a change of policy or growth inducing for several reasons. Over the last 20 years, City and County policies for confined city development have proven to be strong enough to confine urban growth within the RUL without comprising the viability of unincorporated agricultural land. The Draft General Plan perpetuates policies for compact urban growth that have been in place since 1975.

Second, other adjustments to the RUL have been made since 1975 to create a more defensible and sensible boundary and to bring urbanized county parcels within the service boundary of the City.

Third, the proposed RUL adjustments will accommodate only a moderate amount of new residential development and will reduce the pressure to make significant changes in the RUL in the near future.

Fourth, the City proposes the RUL changes to create a more sensible form for the city and establish a more defensible RUL boundary for the 25 year term of the plan to reduce the long term growth potential.

## RUL Adjustments and Agricultural Land

The expansion of the RUL to include the four new areas has a very limited affect on high quality agricultural land. The following describes the agricultural characteristics of each of the four areas.

**State Hospital:** The 387 acre State Hospital site is essentially developed for institutional purposes and the General Plan does not assign any new development potential to the site. According to the U.S. Soil Conservation Service Capability Classification System, about 60 percent of the site is designated Class III and IV (non-prime) and the balance of the site is classified Class V - VIII (non-prime). The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), identifies the entire site as non-agricultural (i.e., a combination of "Urban/Built-Up Land" and "Other Land.")

**Foster Road Parcel:** This 13-acre parcel is bordered by incorporated land on the north, east, and south sides. According to the U.S. Soil Conservation Service, the parcel straddles the line between Class III and IV (non-prime) and Class V-VIII (non-prime). The California Department of Conservation's FMMP classifies much of the site "other land" (i.e. nonagricultural). The area is currently used for occasional grazing.

**Trancas/Big Ranch:** This 40-acre area is classified Class III and IV in the U.S. Conservation Service's system. The California Department of Conservation's FMMP classifies the southern 17 acres of the area as "Farmland of local importance" and the northern 23 acres of the site as "Farmland of Statewide Importance." Existing development consists of low intensity rural residential uses. Small portions of land are used for occasional seasonal plantings of corn, flowers, Christmas trees, etc.

**Trancas/Silverado Trail:** This 5-acre vacant parcel falls into Class I and II (prime ag. land) based on the U.S. Soil Conservation Service's System. The California Department of Conservation's FMMP classifies the site as "Prime Farmland." There is no agricultural development on the property.

The City considers the proposed RUL adjustments moderate and sensible as explained earlier in this Standard Response. The changes result in a more defensible line and affect such a small amount of agricultural land relative to the scale of the agricultural and open space setting that will remain protected outside the RUL. The agriculturally designated properties within the RUL adjustment areas are already parcelized in a pattern that



precludes significant and viable agricultural development in the future. This is not considered a shift in City Policy. (See also Standard Response Stanly Ranch).

## Consistency with the County General Plan

Some of the comments in communication #13 from the County Counsel question whether the City's proposal to make minor adjustments to the RUL is consistent with the goals and policies of the County General Plan. The City believes, first, that the RUL adjustments are consistent with the County General Plan's goals and policies, and secondly, that there is no requirement that the City's General Plan be consistent with the County's General Plan. With respect to the County General Plan, which has a planning horizon to the year 2000, the City believes that the proposed RUL adjustments are consistent with the fundamental goals and policies for the confinement of city development within defensible urban boundaries and the ultimate protection of significant expanses of agricultural land within the county.

The following information found in the County's General Plan supports the City's proposal to adjust the RUL, particularly in areas that may have some agriculturally designated land.

The Introduction to the County General Plan, page ix, under "How to Use the Napa County General Plan", states *"Since the actual designation of land use areas as contained in the general plan is conceptual rather than parcel specific, some additional interpretation is required."* The text goes on to explain that the method for determining and refining land use boundaries is by *"reference to utilities and natural boundaries such as rivers, watersheds, soil types, and various terrain features as well as reference to railroads, highways and other man-made features."* It should be noted that the criteria for establishing the appropriate location for the adjusted RUL line use many of the same determinants.

The County's Land Use Map is more graphic in nature and is not of a scale to show the features listed above for refined definition of land use areas. The map shows generally the unincorporated areas of the county and designates virtually the entire valley floor as agricultural resource, excepting areas within the incorporated limits of the towns and cities. On the County General Plan Land Use Map, the north east corner of Big Ranch Road and Trancas appears to be designated agricultural resource; although the County delineation of the area does not appear to be consistent with the County General Plan criteria for defining land use boundaries.

City General Plan and RUL expansion areas were defined based on very site-specific considerations. The proposed adjustments to the RUL were considered based on criteria for establishing boundaries as defined in the County General Plan with a goal of creating a sensible and more defensible boundary for urban development for the next 23 years, in the interest of promoting the planned, orderly, efficient development of the area within the RUL.

The area at the northeast corner of Big Ranch Road and Trancas Street has urban development to the west and an intensely developed commercial shopping center directly across Trancas to the south. The only dividing line between these urban and county lands are two arterial roadways. Salvador Channel, on the other hand, creates a significant visual and physical boundary between this area on the City side and the intensely developed agricultural land to the north of the Salvador Channel Riparian corridor. The proposed RUL line would be more consistent with County General Plan criteria for determining appropriate land use boundaries than the current location of the RUL line.

For the reasons discussed in this response, the adjustments to the RUL will establish a sensible and defensible RUL boundary, consistent with the following five goals of the County General Plan:

**Goal 1** To plan for agriculture and related activities as the primary land use in Napa County and concentrate urban uses in the County's existing cities and urban areas.

- Goal 2** To develop and implement a set of planning policies which combine to define a population size, rate of population growth and the geographic distribution of that population in such a manner that the desired quality of life is achieved.
- Goal 3** To determine what the land is best suited for; to match man's activities to the land's natural suitability; to take advantage of natural capabilities and minimize conflict with the natural environment.
- Goal 4** To work with cities, other governmental units, citizens and the private sector to plan for services facilities and accommodations, including housing, transportation, economic development, parks and recreation, open space and other total county needs.
- Goal 5** To implement the General Plan in every possible way to:
- a) ensure the long term protection and integrity of those areas identified in the General Plan as agricultural, open space or undevelopable;
  - b) stimulate the development of those areas identified in the General Plan for residential, commercial and industrial.

The City disagrees with the assertion of one of the commentators that any conflict between City's Draft General Plan and the County's General Plan constitutes a significant impact. The City believes Appendix G(a) refers to situations in which a project is inconsistent with the general plan or some other environmental policy of the city or county with jurisdiction over the project. State law contains numerous requirements for consistency of projects with the *legally* applicable general plan and specific plan. In this case, the City of Napa has responsibility for adopting a general plan for its territory and surrounding planning area. The County has responsibility for adopting a general plan for all unincorporated territory. There is no requirement in California that a city's general plan be consistent with the county's general plan. There is no hierarchy among general plans. In general plan matters, cities and their surrounding counties are sovereign. Any conflict between any particular provision of the Napa Draft General Plan and the County's General Plan does not by definition create a significant impact.

## Agricultural Land Conversion - Findings of Significance

The criterion of significance for agricultural land conversion (p.3.2-3) is that a significant impact would occur if the project would convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land pursuant to *CEQA Guidelines*, Appendix G (y).

The DEIR has been revised to find conversion of prime agricultural land a significant impact.

## RUL Expansion Criteria

Specific RUL expansion policies have been included in the Draft General Plan Policy Document in the Administration Chapter. Since there are currently no adopted criteria for modification of the RUL, the additional policy is intended to strengthen the City's ability to maintain the RUL integrity in the future. One of the criteria requires consistency with all of the findings of the County's Measure J which imposes severe restrictions on any changes to unincorporated land. These restrictions do not currently apply to the City since Measure J only addresses the County's General Plan. The RUL adjustments that are proposed with the Draft General Plan are to be considered along with the new policies for controlling the RUL, and together are intended to result in an RUL "package" with this General Plan that will be logical, and difficult to modify over the next 23 years.

## STANDARD RESPONSE STANLY RANCH

### Background

The following timeline clarifies the City's historic jurisdiction over the Stanly Ranch Planning Area:

- 1955 Golden Gate Avenue "cherry stem" and northernmost approx. 40 acres of Stanly Ranch annexed to city.
- 1964 Remaining southern acreage of Stanly Ranch is annexed to city and the site is zoned for residential use.
- 1968 General Plan designates Stanly Ranch for "waterfront oriented residential" (density undetermined). General Plan maps show Stanly Ranch within city-defined 10 year "Sphere of Influence" which was established before LAFCO was created.
- 1970 LAFCO adopts its first Sphere of Influence (SOI) for Napa which includes Stanly Ranch.
- 1972 LAFCO modifies Napa's SOI and excludes Stanly Ranch.
- 1975 Stanly Ranch included in the City's RUL when it is first established.
- 1975 General Plan designates Stanly Ranch for residential uses.
- 1982 General Plan designates Stanly Ranch as "Study Area", subject to further evaluation to determine specific land use designations.
- 1983 Golden Gate Avenue "cherrystem" deannexed because Stanly Ranch contiguity was accomplished with annexation of Napa Valley Corporate Park.
- 1991 Council authorizes cooperative planning effort between City and property owners to prepare a Specific Plan for Stanly Ranch.
- 1992 Council indicates preference for a mixed residential/resort type of development as basis for Specific Plan for Stanly Ranch after considering 3 alternatives during a study session.
- 1991-94 City departments and agencies provide input on issues related to development of Stanly Ranch.
- 1994 Property owners put hold on specific planning process.
- 1996 *(September) Draft General Plan Released for Public Review*
- 1997 *(May) Draft Stanly Ranch Specific Plan submitted to City including General Plan Amendment and Rezone application.*

The Stanly Ranch Planning Area is located at the southwestern edge of the city, primarily west of SR 29 and south of SR 12/121. This approx. 853-acre area was annexed to the city in two phases during the 1950's the 1960's, but has remained undeveloped and constitutes the largest single area of vacant land remaining within the RUL. It lies outside LAFCO's adopted Sphere of Influence for the City of Napa and the current service boundaries of the Napa Sanitation District. The 1982/86 General Plan designated this property as a "Study Area". In 1991, the City Council approved a cooperative planning effort between the property owners and the City to prepare a Specific Plan for Stanly Ranch. City staff's role was to participate in the identification of issues and technical requirements



for the Specific Plan. Based on work done prior to the 1996 release of the Draft General Plan, the planning area was given land use designations for a combination of uses and assumed these potential uses for traffic modeling and other environmental analysis purposes:

- **Tourist Commercial**, which includes destination-resort hotels and their recreational amenities, community and visitor-serving retail commercial, restaurants and similar uses.
- **Single Family Infill**, which provides for detached and attached single family homes, planned unit and cluster developments, and compatible uses.
- **Single Family Residential**, which allows a detached single family development pattern
- **Public Serving**, which provides for major parks and large areas of open space in private ownership; these lands may be subject to deed restrictions to maintain the land as open space. Lands within this designation may be used for outdoor recreation purposes, such as trails and related uses.

This combination of uses was not intended as a specific development proposal, but to provide a set of conceivable land uses that the Planning Area might generate as a planning component of the city and that could be analyzed in the General Plan EIR.

A Specific Plan application was submitted to the City on May 8, 1997 and the project and environmental review process has begun. As previously noted, the release of the Draft General Plan and DEIR (to which this discussion responds) occurred in Fall 1996. The Draft Specific Plan proposal for Stanly Ranch includes a high quality, destination resort community with the following components: a 45,000 square foot lodge with a ballroom, meeting rooms and restaurant, 300 guest cottages/resort homes, a spa and 18 hole golf course. The Draft Specific Plan also includes six residential neighborhoods with up to 540 market rate and 54 employee homes; a 40,000 square foot retail wine center with 40,000 square foot winery; and retention of 440+ acres of lowlands adjacent to the Napa River as open space. The proposal also provides for construction of a Bay Trail through the project and may include the offer a river trail easement. The Draft Specific Plan includes a detailed study of Stanly Ranch, the proposed pattern, distribution and intensity of development, proposed open space uses, infrastructure improvements, and a program of implementation. An Environmental Impact Report will be prepared as part of the Specific Plan.

## General-Plan-Level Verses Specific-Plan-Level Environmental Analysis

Several commentators state that the General Plan DEIR either ignored or too briefly assessed the environmental impacts of development of Stanly Ranch. The DEIR does not ignore the Stanly Ranch and its potential impacts if and when it is developed. The DEIR analyzes the environmental impacts of the land use designations contained in the proposed Policy Document at the level appropriate for a general plan amendment. As provided by Section 15146(b) of the CEQA Guidelines, this analysis focuses on the secondary effects that can be expected to follow from the amendment of the Napa General Plan, but it need not be as detailed as the EIR that will be required for the processing of the Stanly Ranch Specific Plan. (See Standard Response Application of CEQA to General Plans.)

## Agricultural Land Conversion

The Stanly Ranch has been within Napa city limits for more than 35 years and within the RUL since its inception in 1975. Given long-standing City policies to confine development within the RUL, there has been an expectation that eventually Stanly Ranch would develop with some non-agricultural or non-open space uses. In the meantime, Stanly Ranch has been used as grazing land and part of the property has been planted with wine grapes.

The agricultural potential of the Stanly Ranch is described according to several classification systems in the Draft General Plan Background Report:

- According to the U.S. Soil Conservation Service Soil Capability Classification System, Stanly Ranch and adjoining agricultural lands fall into Class III and IV (with Class I and II considered "Prime Agricultural Soils").
- According to the California Department of Conservation Farmland Mapping and Monitoring Program, Stanly Ranch is classified "Farmland of Local Importance", the third rank in the State's system behind "Prime Farmland" and "Farmland of Statewide Importance".
- According to the City of Napa's analysis of Department of Conservation Napa County Land Use Mappings, Stanly Ranch is classified "Resource Lands", the third rank behind "Intensive Agriculture" and "Non-Intensive Agriculture".

The criterion of significance for agricultural land conversion (p. 3.2-3) is that a significant impact would occur if the project would convert prime agricultural land to non-agricultural use or impair the agricultural productivity of prime agricultural land pursuant to CEQA Guidelines, Appendix G (y).

The conversion of Stanly Ranch to urban or urban and other open space uses does not meet the threshold of conversion of prime agricultural land to non-agricultural use and is therefore considered less than significant (I). Additionally, so as not to impair the agricultural productivity of any agricultural land outside of the RUL, General Plan policies require that urban/rural conflicts adjacent to the RUL be minimized through a combination of measures including agricultural buffers, progressively lower densities, etc. The Stanly Ranch EIR will analyze specific impacts of the proposed development pattern on adjacent agricultural uses.

## Visual Quality

As noted above, Stanly Ranch is conceptually assumed to develop with a combination of uses including tourist uses, a golf course and recreational facilities, residential uses, and open space uses. Development of these facilities and uses will obviously change the existing view of the property to some extent; however, specific impacts are dependent on the proposed Specific Plan and must be examined at the specific plan level based on the details of the proposal.

Most of the development on Stanly Ranch would be screened from the view of residents and visitors entering the city from the south via the Southern Crossing by the extensive, mature eucalyptus windrows present on the Ranch. These same windrows would screen this development from the views of eastbound travelers along Highway 12/121 and southbound travelers along Highway 29/121. The one exception referenced above is the portion of the Stanly Ranch "panhandle" located on the east side of Stanly Lane. However, this area is likely to be developed with a wine center and winery, which would be entirely consistent with, and supportive of the scenic vistas and landscapes traditionally associated with the Napa Valley. Accordingly, the Stanly Ranch, once it is developed, will continue to serve as an appropriate and aesthetic gateway to the city of Napa.

The DEIR's criteria of significance for visual impacts (p-3.6-2) is that a significant impact would occur if the project:

- Conflicts with the adopted environmental plans and goals of the community; or
- Results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view.

The Draft General Plan sets the City's environmental goals and policies, which call for integrating the urban environment with the city's natural features; as such it sets the policy framework within which the Specific Plan



must perform (p. 1-21 of the draft GP Policy Document) To the extent the Specific Plan must stay within the General Plan policy framework, and to the extent that the concept for development is highly unlikely to create an aesthetically offensive site open to public view, visual impacts are considered less than significant (I).

## Public Facility Impacts

The General Plan sets the policy criteria for subsequent development proposals, requiring that adequate public facilities are available to serve new development; that all new development meet adopted service level standards, that new development pay its fair share, etc. (p. 4-2 of the Draft Policy Document). The Draft Stanly Ranch Specific Plan and its accompanying EIR will examine these issues in more detail and must show that these criteria are met. The General Plan DEIR analysis of transportation, water supply, wastewater, solid waste, and other facility impacts incorporated the conceptual development potential described for the Stanly Ranch in the Draft General Plan Policy Document.

## Growth Inducing Impacts

Several commentators feel that designating Stanly Ranch for development is growth inducing (See County Counsels discussion of growth inducing effects; Comments 12.1 and 13.20). The City disagrees. As noted earlier in this response, Stanly Ranch has been part of the incorporated City of Napa since the 1960's and there has long been an expectation that it would eventually be subject to some level of urban development. The greatest limit on growth inducing impacts of Stanly Ranch development is the *confined city policy* implemented through the Rural Urban Limit (RUL) which has encompassed the Stanly Ranch since its inception in 1975. The very minor (mostly corrective) adjustments to the City's RUL over the last 20 years have demonstrated the effectiveness of both City and County policies in confining urban growth and resisting pressure to develop county agricultural and open space areas. The criteria for RUL modification will make it extremely difficult for city development to occur beyond the RUL within the time frame of the General Plan. *See Standard Response RUL.*

## Alternatives Analysis

The DEIR considers a range of alternatives, including the "No Project Alternative". Comments 13.10 and 15.2 argue that the alternatives analysis is inadequate in not considering deannexation of Stanly Ranch.

Deannexation and the "No Project Alternative", which would retain Stanly Ranch as a "Study Area", are essentially the same alternative for Stanly Ranch since neither would allow any urban development in the area.

## Use of the General Plan EIR for LAFCO Sphere Revision

The introduction to the DEIR describes the use of the DEIR and public agencies that will review the document. While Napa County LAFCO did review and comment on the DEIR, the City did not assume that the EIR for the General Plan would be sufficient environmental review for LAFCO's decision to expand Napa's SOI to accommodate Stanly Ranch. A sphere modification request for Stanly Ranch could be filed in conjunction with the Specific Plan; however, the City does not believe that a modification of the Sphere of Influence is necessary for the development of land already incorporated into the city limits.

Comment 15.2 cites two provisions of State LAFCO law (Government Code Sections 56300 and 56301) that the commentator feels may conflict with the inclusion of Stanly Ranch within Napa's sphere of influence. The City feels LAFCO could approve a sphere expansion for Stanly Ranch today consistent with the intent of Government



Code Sections 56300 and 56301.

Government Code Section 56300 charges LAFCO with the responsibility to encourage and provide for “planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space lands within those patterns. As described under the Standard Responses for RUL and earlier in this response, the city’s jurisdictional authority over the Stanly Ranch was established when the land was incorporated in two phases in 1955 and 1964, prior to the creation of LAFCO and the adoption of any sphere of influence. The RUL policies have proven to be effective in maintaining the open space and agricultural uses outside of the RUL and to maintain a confined urban form.

Government Code Section 56301 establishes some of the purposes of LAFCO including the “discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies based upon local conditions and circumstances”. The City believes that the fact that Stanly Ranch has been within the City limits for over 35 years constitutes an “existing local condition and circumstance” and that the RUL policies have protected adjacent agricultural land from the pressures of development and that these policies comprehensively and effectively address the issue of urban sprawl in Napa.

## **STANDARD RESPONSE BIG RANCH SPECIFIC PLAN AND EIR**

The City of Napa approved the Big Ranch Specific Plan, associated general plan amendments, rezones and financing plan on October 22, 1996 (City Council Resolution 96-235), after the Draft General Plan EIR was released for public review on October 2, 1996. An environmental impact report was prepared and certified for the Big Ranch Specific Plan.

The approximately 430 acre Big Ranch Specific Plan Area (BRSPA) consists of incorporated land (about 334 acres) and unincorporated land (about 96 acres) located in the northeast corner of the city of Napa. The BRSPA is bounded by Trower Avenue (north), Big Ranch Road (east), Trancas Street (south), and Jefferson Street (west).

The BRSPA identifies development opportunities on about 300-acres of the BRSPA (defined as vacant or under-used lands); designates most of the area for residential use; provides for commercial, public/quasi-public, and agricultural, open space, and park uses; and retains the remaining 130 acres of existing uses.

The BRSPA provides for development at a variety of densities in order to accommodate different housing types, to ensure compatibility with adjacent development and to retain the character of existing residential areas while also permitting infill development.

Based on the Estate, Low-, Medium-, High-density residential designations contained in the BRSPA, buildout of the BRSPA could result in construction of approximately 889 new housing units. The BRSPA would not change density designations of built-out residential areas.

The BRSPA would not change existing public/quasi-public, office, general commercial, and neighborhood commercial land use designations except at two locations in the southeast corner of the BRSPA. The Land Use Plan reclassifies non-residential uses in the following areas (1982 general plan land use categories):

- About two acres at the Trancas/Big Ranch intersection would be redesignated for Neighborhood Commercial (NC) use. (Draft GP equivalent designation is LC)
- About five acres of Trancas Street would be redesignated for high density residential (RH-18) use. (Draft GP equivalent designation is MFR)

- About ten acres of Vintage Farm land would be redesignated from RL-6 to Public/Quasi-Public District (PQ). (Draft GP equivalent designation is PS)
- All 26 acres of the Queen of the Valley Hospital would be designated PQ, thus changing some non-PQ uses.

Addendum #3 to the Draft Policy Document has been prepared to incorporate the adopted specific plan land use designations and circulation revisions into the Draft General Plan. Land Use designations have been translated into the equivalent categories developed for the Draft General Plan. The Draft General Plan designation of BRSP-33 anticipated the eventual adoption of the Specific Plan and served as a place holder in the land use designations pending incorporation of the details adopted with the Specific Plan.

As noted in several comments, the Big Ranch Specific Plan EIR and Draft General Plan EIR reached different conclusions regarding the significance of several types of impacts. The Big Ranch Specific Plan Final EIR found that the Big Ranch Specific Plan will cause or contribute to six significant, unavoidable environmental effects:

- 1) cumulative traffic effects at the State Route 29/Trower and State Route 121/Trancas intersections;
- 2) secondary construction-related impacts from building water distribution facilities;
- 3) secondary construction-related impacts from building wastewater conveyance facilities;
- 4) water demand during drought conditions;
- 5) cumulative demands on water service during drought conditions; and
- 6) cumulative demand on wastewater treatment capacity.

The Draft General Plan EIR on the other hand found none of these impacts significant and unavoidable. Some of the differences reflect the perspectives of different EIR preparers. The environmental analysis and findings in the DEIR have been reconsidered in light of the Big Ranch Specific Plan and other relevant environmental documents. In the case of traffic, water supply, and wastewater, additional analysis has been added in the Revised DEIR and the conclusions about the significance of these impacts have changed.

## STANDARD RESPONSE TRANSPORTATION

### Significance Criterion

The following criteria are used in the revised DEIR to define the level of significance for traffic impacts:

- For freeway mainline sections and freeway ramps, the threshold level used in this analysis is LOS E, consistent with the criteria used by the County Congestion Management Authority (CMA). Facilities under the jurisdiction of the CMA in the City of Napa are the State Highways (12, 29, 121, and 221) plus Trancas Street. If a segment drops below LOS E, it is considered a significant traffic impact.
- The Draft General Plan establishes a minimum acceptable level of service for signalized intersections on arterial and collector streets at midrange LOS D. Midrange LOS D represents delays greater than 32.55 second per vehicle. It should be noted that for purposes of determining significance in the broader context of the General Plan, 2020 LOS levels that are slightly higher than midrange D are considered mitigated. Midrange LOS E would be permitted in the following areas:

Downtown Napa within the area bounded by Soscol Avenue, First Street, California Boulevard and Third Street;

Jefferson Street between Third Street and Old Sonoma Road; and,

**Silverado Trail between Soscol Avenue and First Street.**

- For unsignalized intersections, the minimum acceptable level of service recommended by the Draft Policy Document is midrange LOS E. Midrange LOS E for unsignalized intersections represents a reserve capacity of 49.5 vehicles per hour or greater and is considered restrictive for purposes of overall evaluation at the General Plan level. For purposes of EIR analysis, LOS F would therefore be considered significant. In the context of the General Plan, given the time frame and extent of variables, “unacceptable” at a single intersection does not constitute significance at the overall project level.
- For transit and bicycle facilities, a significant effect would occur if General Plan proposals and policies thwarted or diminished access to transit service or bicycle routes, eliminated routes, or did not support use of these alternative modes of transportation.

**Mitigation and Findings Concerning Level of Significance**

The Draft EIR found no significant traffic impacts; However, based on several comments on the Draft EIR and reconsideration, the findings of significance have been revised as follows:

With the improvements recommended in the General Plan, all but one signalized intersection would operate within or very close to the established criteria. The single intersection which would not satisfy the criteria, SR 221 at SR 29, is currently already operating at LOS F. The City’s contribution to the intersection with the Draft General Plan is minor, making this a cumulative condition. Factors that cause this impact to be beyond the City’s ability to mitigate are: 1) The intersection is outside of the City limits and the City’s jurisdiction; and 2) The primary cause of the impact is traffic passing through Napa County between Solano and Sonoma County. The City will continue to participate in the CMA and coordinate with Caltrans and other jurisdictions in an effort to address the traffic issues that occur on the 12/29 corridor, including the condition at the 221/29 intersection; but, because of the ongoing condition at this intersection, the impact has been recharacterized as a significant cumulative impact.

The City has also recognized that the source of funding for all projects that serve as mitigations in the General Plan is not guaranteed. The City, however, through its Capital Improvement Program, will endeavor to schedule and fund road improvement projects in response to the needs outlined in the policies and thereby adequately address the potential impacts related to future development. Regardless of the City’s commitment to implement the necessary road projects, the uncertainty of funding affects the feasibility of mitigation and therefore this circumstance has been characterized as a potentially significant impact.



## STANDARD RESPONSE WASTEWATER

### NSD Planning Assumptions

NSD's 1990 Master Plan update was based on the following population projections for year 2012 (Sec . D.2.3):

<b>Table 2.1</b> <b>NSD Primary Service Area Population Projections</b> <b>NSD-ACCWD Master Plan Update</b>				
Year	RUL <sup>1</sup>	Silverado <sup>(2)</sup> Country Club	Unsewered <sup>(3)</sup> Population in RUL	Total Sewered Population
1985	60,900	1,846	4,130	58,616
1990	64,500	2,195	3,397	63,498
1995	67,700	2,544	2,664	67,580
2000	72,500	2,544	1,932	73,122
2005	75,100	2,544	1,200	76,444
2010	N.E. <sup>(4)</sup>	2,544	N.E. <sup>(4)</sup>	80,000
2012	N.E. <sup>(4)</sup>	2,544	N.E. <sup>(4)</sup>	82,000
(1) ABAG 1985. (2) Estimated at 2.4 persons per dwelling unit and 100 percent occupancy. (3) Assumes 30 percent of 1985 RUL population outside of the City is sewerred, increasing to 80 percent by the year 2005. (4) N.E. = not estimated.				

Excluding the Silverado Country Club area, the plan assumed a population of approximately 79,500 within the RUL by 2012.

The Draft General Plan projects a 2020 RUL buildout population of 81,140, which is slightly lower than what the City of Napa's 1982 General Plan projected for the year 2012. With the reduced capacity of the new General Plan and the extended time frame, it is unlikely that Napa's RUL population would exceed 77,500 by the 2012, well within the planning assumptions used by NSD in its 1990 Master Plan update.

### Planning and Financing Analysis

Several commentators suggest the City's General Plan DEIR should be providing detailed analysis of wastewater flows from existing and projected development both within and outside the RUL, the capacity of NSD facilities to accommodate those flows now and in the future, and the financial feasibility of developing Phases II and III improvements in the Sewage Treatment Master Plan.

The City of Napa rejects the assertion that the City is responsible for conducting such analysis for Napa Sanitation District's system.

## Significance Criterion

The significance criterion for "wastewater treatment, storage, and disposal" has been revised and in the recirculated DEIR reads as follows: "A significant impact would occur if new development authorized by the General Plan generated wastewater flows that exceeded the existing or planned wastewater treatment, storage, and disposal capacity of the Napa Sanitation District system."

This criterion is essentially the same as the significance criterion used in Napa County's DEIR for the Napa County Airport Industrial Park: "A project would have a significant impact if it: [g]enerates additional wastewater that exceeds the existing or planned capacity of the sewage treatment and disposal system."

## Mitigation and Findings Concerning Level of Significance

Clearly, wastewater flows from new development authorized by the General Plan cannot be accommodated by the existing NSD facilities and possibly cannot be accommodated by already planned NSD facilities. This is considered a significant impact. The City, however, understands that NSD will continue to plan, design, finance, and construct facilities adequate to meet the needs of NSD's entire service area.

To ensure that new demands from new City development will not exceed NSD's capacity, the City could require that all new applicants for development secure a "will-serve" letter from the Napa Sanitation District if the District notifies the City that a critical capacity situation exists. The City would not approve the new development without the "will-serve" letter. The addition of this mitigation measure would reduce the level of significance for wastewater impacts to less than significant (I).

Addendum # 7 to the Draft Policy Document has been prepared to incorporate additional language into Policy CS-10.3 to supplement its effectiveness as a mitigation measure. Revised Policy CS-10.3 will read:

*The City shall coordinate development review with the Napa Sanitation District to ensure that adequate wastewater collection, treatment, and disposal facilities can be provided by the District by requiring that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists.*

*Where a critical capacity situation does exist, the City shall not issue, in the absence of a will-serve letter from the NSD, any building permits or similar ministerial entitlements for proposed structures that would increase net demand on NSD treatment capacity. In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document, information assessing whether NSD is likely to have sufficient capacity to serve the proposed development.*

*In approving any such discretionary project, the City shall require, as a mitigation measure and condition of approval, that the applicant(s) shall obtain the necessary will-serve letters from NSD prior to receiving approval of a final subdivision map, or in the absence of the need for a final subdivision map, prior to receiving approval of any required building permits or similar ministerial approvals.*

## STANDARD RESPONSE WATER SUPPLY

### SWP Entitlement Buildups

The City of Napa currently has sufficient water supplies during normal and wet years as indicated in the Water System Optimization and Master Plan (Adopted 11/18/97). Due to the City's increasing entitlement from the State Water Project (SWP) and the minimal increase in water demand from growth through the year 2020, the City does not have a shortage of water supplies in normal rainfall years. During drought years when water supplies from local sources are reduced and the City's SWP entitlements are cut back, the City faces a deficit in water supplies as do many other State Water Contractors. The City's current deficit during drought years is 4,200 acre feet of water assuming a reduction in SWP entitlements of 50% and a local reduction in water demands of 20% as a result of demand management programs which the City would implement during drought periods. The potential reductions in supply from the SWP is what causes the City to experience a drought year water supply shortfall. This existing estimated 4,200 acre feet deficit in drought years will reduce each year as the City's SWP entitlement increases and based on the current schedule of entitlement build up from the SWP, the City will have sufficient water supplies in both dry and normal years after the year 2012. The City's concurrent schedule of entitlement build up from SWP is greater than the City's water supply needs.

The City's water supply from the SWP was reduced by 80% in 1991 and by 55% in 1992 due to the drought the state experienced between 1987 and 1992. During this time, the City demonstrated that voluntary and mandatory conservation practices could achieve up to a 33% reduction in water demand. There was sufficient water to meet daily needs with only minor inconvenience and marginal loss of irrigated landscape. An 80% reduction from the SWP is considered severe and, for reasons outlined below, is not likely to occur again; but the City's ability to provide adequate water supply during severe drought conditions has been demonstrated.

Based on the experience gained from the last drought, the Department of Water Resources (DWR) has adjusted how the SWP is operated. Prior to 1991 DWR had never experienced multiple years of drought and were therefore hesitant to cut back deliveries in dry years. They are now operating the State Water Project very differently. Since 1992, the Department of Water Resources has begun each year with reductions in entitlement until rainfall and snow fall is adequate to ensure delivery of full entitlements to each State Water Contractor. This change in operation will result in more years when the City will experience small cut backs in its entitlement deliveries from the SWP, but will also result in less severe cut backs in any single year due to the more cautious management of the State's water supplies. This management approach will improve the City's water supply reliability because in normal and wet years the City has excess water supplies and currently only experiences a deficit if SWP entitlements are reduced more than 25%.

The City is able to reduce the impact of SWP entitlement cutbacks by taking advantage of Interruptible Entitlement water deliveries that are often available in wet Winter months when there are excess flows within the Delta. These excess flows are a result of uncaptured runoff from the tributaries to the Delta. Delivered water from these excess flows are not considered entitlement deliveries, allowing the City to take more water than the allocated SWP entitlements in any given year. Interruptible Entitlements are unpredictable, but were available in 1991 and 1992 which were the worst years of the drought. Napa County water agencies with SWP entitlements were able to take 676 acre feet of Interruptible Entitlements in 1991 and 1,058 acre feet in 1992 over and above the normal SWP entitlements. This reduced the impact of SWP reductions in entitlement deliveries significantly. Solano and Napa County water agencies have been able to take advantage of Interruptible Entitlements because the location of the SWP's North Bay Aqueduct and where it connects to the Delta allows these agencies to benefit from these excess flow conditions in the Delta long before other State Water Contractors. The amount of water supply available in dry years from Interruptible Entitlement deliveries is difficult to quantify, but is available in most years to the City and improves the reliability of the SWP.



## **The Monterey Agreement**

Recent agreements by the State Water Contractors has also resulted in improving the reliability of the SWP. The State Water Contractors drafted the Monterey Agreement in 1995 which has recommended changes in the SWP contracts to allow contractors to more easily enter into water transfer agreements and make adjustments to their entitlements and their entitlement build up rate. While the Monterey Agreement in its entirety has not yet been implemented, a final environmental document has been certified and many of the provisions are being implemented by DWR. This has also increased the SWP reliability by allowing State Water Contractors to better manage their water supplies. The City has requested the Napa County Flood Control and Water Conservation District (NCFCWCD) contact DWR on the City's behalf to pursue the acceleration of the City's SWP entitlement to the City's full amount of 18,800 acre feet. The City would satisfy its drought year water supply needs by accelerating to the full entitlement amount. The City's existing SWP entitlement is 6,600 acre feet (1997) and increases by approximately 400 to 500 acre feet per year until it reaches 18,800 acre feet in the year 2021. When DWR cuts back deliveries of entitlements, it reduces the delivery by a percentage of the State Water Contractors current year entitlement. The City currently has a very slow build up of entitlement through the year 2021 when the City's entitlement reaches its full amount. Many other State Water Contractors have already reached or will reach their full entitlement much quicker than the City of Napa. The City will improve its water supply reliability by accelerating this build up of entitlement because the SWP reduces deliveries in dry years by a percentage of State Water Contractors entitlements. With a larger entitlement the City will receive more water in dry years because the reductions in deliveries will be a percentage of a much larger number resulting in a greater supply of water. Accelerating the City's SWP entitlements will not result in the need for additional physical improvements to the City's water system or the SWP.

## **SWP Drought Water Bank**

During the recent drought DWR developed an emergency drought water bank by purchasing water from the agricultural community and various agencies that had excess water available. This water was then made available for purchase by State Water Contractors. The program was well received and was so successful that in both 1991 and 1992 DWR was able to secure more water than was purchased from the drought water bank. The City of Napa did not take advantage of these water supplies because the City was able to purchase drought water supplies from Yuba County Water Agency. DWR has recently formalized the State Drought Water Bank program and has certified an environmental document (November, 1993) making plans to implement the water bank in future years to provide drought water supplies to State Water Contractors. This is another very viable option available to the City in the event another severe drought occurs.

## **Other SWP Drought Year Projects**

Since the recent drought, the State Water Contractors have been meeting with DWR and actively encouraging the development of additional water supplies to increase the reliability of the SWP during drought years. DWR is currently pursuing two dry year water supply projects. The first is called the American Basin Conjunctive Use Project which will develop approximately 55,000 acre feet of additional water supplies in dry years (Pre-Feasibility Report, American Basin Conjunctive Use Project, February 1995). DWR solicited interest in this project and the NCFCWCD has contacted DWR on the City's behalf indicating interest in the project. The NCFCWCD has indicated to DWR that the SWP subcontractors in the county of Napa are interested in 2,800 acre feet of the 55,000 acre feet the project would potentially yield.

The second project being investigated by DWR is titled "State Water Project Supplemental Water Purchase Program" and is a project pursuing the development of a dry year water purchase program where contracts with various agricultural interests and other agencies would be developed allowing for the purchase of water supplies

during years when the SWP could not deliver full entitlements to all State Water Contractors. This project would potentially provide DWR with 400,000 acre feet of dry year water supply that would be available to State Water Contractors for purchase in dry years. DWR has prepared and distributed a draft environmental document covering the project titled "State Water Project Supplemental Water Purchase Program, Draft Program Environmental Impact Report, State Clearinghouse 94082033". Both of the projects listed above are options identified in the Draft Water System Optimization and Master Plan that are viable water supply alternatives available to the City to increase drought year water supplies. The referenced environmental documentation regarding these SWP programs are available for review at the City of Napa Public Works Department, 1600 First Street, Napa, CA.

## Reclaimed Wastewater

Another option to improve the City's water supplies identified in the Water System Optimization and Master Plan is the utilization of reclaimed waste water to offset current potable water supplies currently being used to irrigate parks, a golf course, and other landscaped areas within the City. The City is currently negotiating terms of an agreement to allow the Napa Sanitation District to deliver reclaimed waste water to certain special City water customers to reduce the amount of potable water supplies used for irrigation purposes within the City's water service area. The area being proposed by the City and the Napa Sanitation District for the use of reclaimed waste water is the area south of Imola Avenue, east of the Napa River, and west of State Highway 221 (including the Napa State Hospital property), the south Napa Market Place, the Stanly Ranch, and the property owned by the Napa Sanitation District adjacent to Imola Avenue bordering the Napa River. It is proposed to off set the use of potable water used for irrigation of turf areas such as the Kennedy Golf Course, Kennedy Park, and the Napa Valley College. The use of reclaimed water in this area could off set approximately 400 acre feet of potable water being used currently for irrigation of landscaping and off set future development in this area that would otherwise use potable water from the City for landscape irrigation.

## Significance Criterion

The significance criterion for water supply and delivery has been revised in the recirculated DEIR to read as follows: "A significant impact would occur if new development authorized by the General Plan increased water demand that exceeded the available existing or planned supply of the City of Napa Water System."

This is essentially the same as the significance criterion used in Napa County's DEIR. on the Napa County Airport Industrial Park: "A project would have a significant impact if it increases the demand for water that exceeds the available supply or the planned supply of the water system."

## Mitigation and Findings Concerning Level of Significance

Historical annual water production by the City over the last 25 years has ranged between about 10,400 and 15,200 acre feet. Annual use of City water production during 1989 to 1994 ranged between about 10,400 and 14,100 acre feet. The Water System Optimization and Master Plan has predicted that annual water usage for the City of Napa Water System will be almost 16,600 acre feet (in normal water years) by the year 2020. In addition, water demand by other entities that are at times supported by the City system (i.e., Calistoga, Yountville, Yountville Veteran's Home) will add an additional 1,460 acre feet to the total demand (Water System Optimization and Master Plan Volume I-Executive Summary, 1996).

Projected water yield in the year 2020 is expected to be approximately 35,200 acre feet (in normal water years). In drought years, the City of Napa Water System demand is expected to be approximately 13,300 acre feet (a 20% reduction of projected demand), while the projected drought year water yield of the City system is expected to be



9,100 to 14,800 acre feet. Therefore, the City of Napa faces a potential water deficit in firm yield during drought years of its supply capacity to meet current annual demands and projected future demands through the year 2012. This estimated deficit is contingent on the estimated firm yield for the local supply sources and the NBA. On an annual basis, the deficit appears to be in the range of 2,500 to 4,200 acre feet for current conditions with the deficit reducing each year until water supplies match the City's demand for water in drought years in the year 2012. From 2012 to 2020 the City has sufficient water supplies to meet drought year demands.

As described above under the Monterey Agreement, the City has submitted a request to the State of California to modify its Table A entitlements for NBA water, which would enable the City to meet water demand during drought periods by accelerating full achievement of the City's SWP entitlements to 1997 rather than 2021. Approval of this proposal by the SWP would result in a less than significant impact.

However, at this time, the proposal has not been officially adopted by SWP. If the Table A entitlements for NBA water are not accelerated as proposed, or a combination of other supply options are not established, the City cannot guarantee water delivery for either the current or future water demand during drought year conditions. The other options from the SWP for water supply during drought years include the Drought Water Bank, American Basin Conjunctive Use project, the State Water Project Supplemental Water Purchase program. A combination of these programs and/or acceleration of the NBA entitlement could be relied upon to provide for the projected drought year deficits through an adopted program and contracts that provide certainty for delivery. Until the city is able to secure a certain and guaranteed water source during drought year conditions there is a potentially significant impact. A mitigation for this potential impact has been proposed in the form of an additional General Plan policy that would require the city to monitor building permits (new water system hook-ups ) and to limit permits if necessary in order to guarantee drought year water supplies to existing and proposed development until such time as a guaranteed drought year water supply is secured. New language will be added to the Community Services Element Policy CS-9.3 to supplement its effectiveness as a mitigation as follows:

*The City of Napa shall determine the firm yield available from existing and future SWP water supply sources and shall monitor, and if necessary, limit growth (new water system hook-ups) in order to guarantee drought year water supplies to existing and proposed development. Growth shall be limited as follows:*

- 1) The City shall not issue any building permits or similar ministerial entitlements for proposed structures that would increase net potable water consumption in the City or its service area in the absence of a letter from the Department of Public Works stating that approval of the permit or other entitlement will not adversely affect the City's ability to adequately serve the public health and safety needs of all of its water customers during drought conditions.*
- 2.) In addition, when conducting environmental review for proposed development projects requiring General Plan amendments, specific plans, use permits, tentative subdivision maps, or similar discretionary approvals, the City shall include within the environmental document information assessing whether the City and its water suppliers are likely to have sufficient water supplies to adequately serve the proposed development and all other City water customers during drought conditions. In approving any such discretionary project, the City shall require, as a mitigation measure and conditions of approval, that the applicant(s) may not receive a final subdivision map or in the absence of the need for such a map, may not receive building permits or similar ministerial entitlements in the absence of a letter from the Department of Public Works stating that approval of the map, permit or other ministerial entitlement will not adversely affect the City's ability to adequately serve the health and safety needs of all of its water customers during drought conditions; and, that there will be sufficient water to serve the basic health, hygiene, and fire suppression needs of the community..*



*When contracts are modified or are executed with the SWP to secure additional reliable water supply for drought years or other dependable and adequate sources are guaranteed, the requirement to limit growth in the manner described above can be suspended.*

The addition of this mitigation measure should reduce the level of significance for water supply during drought to less than significant; however, since water supply is ultimately dependent on several factors of nature which are out of the City or State Department of Water Resources control, drought year water supply remains uncertain for all water purveyors in California. As such, this impact is still considered potentially significant, even after mitigation.

## Further Discussion of “Significant” Water Supply Impact

As described above, the City has decided to revise the impact conclusions in the Draft EIR related to water supply during drought times; however, based on past experience the City has demonstrated that there is sufficient supply, when combined with conservation practices, to ensure that there will be adequate water to preserve the health and safety of the citizens of Napa. In order to clarify the term “potentially significant” used in the conclusion above, the drought impact would consist of a loss of landscaping due to landscape irrigation cut backs and a certain level of inconvenience to citizens as they implement conservation practices in daily living. The “potentially significant” impact identified above is not an impact to the public health and safety; there will be sufficient water to serve basic health, hygiene and fire suppression needs of the community.

The City of Napa has a proven record of providing sufficient water during severe drought year conditions as experienced throughout the State in the early 1990’s. In 1991 the City implemented mandatory water conservation measures and reduced water consumption by 33%. The City was able to reduce consumption without a threat to public health, or too much inconvenience to consumers, primarily by reducing the consumption of water for landscape irrigation. This maintained a dependable water supply for indoor needs.

The following example of how water is consumed in Napa is helpful in understanding why the drought year water supply is not as critical as the strictly analytical data conclude. The City’s 1996 water demand, excluding landscape irrigation, was 8,250 acre feet. The City’s water demands for indoor needs without a substantive change in customer habits is approximately 50% of the City’s annual water demand. The actual percentage of indoor water demand necessary to meet the “critical” health and safety needs of the citizens is not specifically known; however, it is likely to be much lower than 50%. For purposes of analysis, it has been assumed that it would not be desirable to ever allow water supplies in the City to be reduced below 50% of normal annual demand. This would allow some landscape irrigation and provide adequate indoor water supplies with limited inconvenience to citizens. The City has a demonstrated conservation “buffer” of 33% percent which, theoretically, could offset a water supply reduction of 80% (As successfully implemented during past SWP cutbacks of up to 80%). As discussed in this standard response, the City has many alternatives for acquiring additional water to make up the deficit after the conservation buffer is added back to the cutback. In reality, the additional water supplies would be needed in order to offset the “inconvenience” of a drought but not to satisfy “critical” indoor water needs. Any combination of the potential water supplies listed in this standard response could meet the City’s current dry year water supply needs, but none are necessary to meet the City’s critical water needs for the health and safety of the residents.

Eventual implementation of the programs described in the Water System Optimization Master Plan will address this issue. The availability of these programs make it possible for the City to resolve drought year water supply deficits well before the year 2012. For this reason, regardless of the revised environmental conclusion above, the City feels that the true potential for a significant impact is extremely slight.

## STANDARD RESPONSE FLOOD CONTROL

Page 8-19 through 8-26 of the Draft General Plan Background Report provides a history of Napa River Flooding and an overview of regulations that have been applied to protect public health and safety. Background discussion also includes a history of flood control planning in the City of Napa. This information is condensed on pages 8-9 through 8-12 in the Health and Safety Element of the Draft General Plan Policy Document and is followed by policies formulated to achieve Goal HS-3 “To reduce the risk to life and property from flooding”.

In addition to the Health and Safety concerns related to flooding, the City has recognized the opportunities that a river amenity offers to the city and the Draft Policy Document addresses the need for improving the urban relationship this important feature as follows:

- Policies LU-1.7, 6.4, 6.5, 6.6, 6.10, 9.1, 9.2, 9.3 and 9.6 in the Land Use Element;
- Policies PR-1.2, 1.5, 3.1, 3.4, 3.8, 5.1, 5.2, 5.7, 5.12, and all of the Policies under Goal PR-6 in the Parks and Recreation Element related to access, recreation and open space qualities along the Napa River.

The City also recognizes that the health of the river is an important aspect of its biological relationship with the region as a supporting habitat for wildlife and a component of the City’s scenic, open space qualities. Policies in the Community Services and Natural Resources Elements of the Draft General Plan support the maintenance and protection of the Napa River resource as follows:

- Policies related to storm drainage under Goal CS-11 in the Community Services Element;
- Policies NR-1.1 through 1.13, NR-3.3, and NR -4.1 through 4.3 in the Natural Resource Element.

Several comments that are focused on the Napa River as a resource are specifically responded to in this document relative to the respective detail of the comment. Comments that are related to the Napa River and the Flood Control Project Design relationship with the General Plan update process (particularly from comment letters 2, 3, 14, 24 and 25) have been consolidated in this standard response.

### History of the Flood Control Project

The Napa River Flood Control Project was authorized as a federal project in 1965 but early studies met with considerable resistance from local citizens. In 1975 a project design was developed incorporating local issues of concern. In 1976 a referendum to determine the acceptability of the flood control project narrowly passed, but a subsequent referendum in 1977 opposing the project passed and the project was placed on inactive status.

Following the 1986 flood event, the Napa County Flood Control and Water Conservation District petitioned Congress to reactivate the flood control project. In response, the Army Corps of Engineers prepared an action plan and began engineering design studies in 1989. The Corps, as the responsible lead agency, subsequently prepared a set of studies and a Draft EIR which were available for public comment until May 1995. The design consisted of levees, setback floodwalls, sheetpile walls, streambank protection, channel excavation, and a bypass channel; it was accompanied with maintenance and hazardous materials remediation. This plan experienced significant public and agency comment regarding the visual impacts, loss of recreational opportunities, other environmental impacts, and general insensitivity to the River’s design relationship to the urban environment. In response, the Corps agreed to engage in a “Two Track Design Concept”. Track 1 proposed that the Corps revise the construction plans and respond to the concerns raised during public review of the DEIR; and, Track 2 proposed the establishment of a Technical Design Committee to study alternatives such as watershed management, dams, alternatives to flood walls, and opportunities for river restoration under the guidance of a Community Coalition.



## **Community Coalition Process**

The Coalition was established as a Tri-party organization of fifty or more people consisting of Chamber of Commerce, NVEDC and the Friends of the Napa River. Members included community leaders, residents, public agency staff and professional consultants and other experts who volunteered their expertise on special support teams throughout the process. Over a 17 month period they conducted extensive review and revision of the Corps design and have developed a geomorphic design which promises a “living river” concept by integrating flood management with environmental and urban design issues. Work has been closely coordinated with state resource agencies to achieve an environmentally sound design.

The Community Coalition and Corps presented the results of their comprehensive re-design of a flood management project to the public on May 9, 1997. The revised project is intended to achieve the following objectives:

- Creation of a plan that provides 100 year flood protection from Napa River flooding within the urbanized areas of Napa.
- Creation of a plan that incorporates elements of a watershed management strategy beyond the Project boundaries that makes geomorphic, environmental, management and economic sense.
- Creation of a plan that embraces and incorporates the elements of a living restored river.
- Creation of a plan that makes economic and financial sense to the Napa County community as well as to the State and Federal governments.
- Creation of a plan that incorporates sound urban design principles and design excellence, that both expresses the community’s unique physical, cultural, and historic aspects and which incorporates the River Project into the fabric of the community.

The revised plan appears to meet the objectives of flood damage reduction, eliminates the primary concerns of the previously developed plan, and would provide significant incidental environmental quality outputs.

## **Status and Timing of Flood Control Planning**

Since the May 1997 presentation, the flood control participants have been endeavoring to determine the means for funding the local share of the project. A decision has been made to place a 1/2 cent local sales tax proposal on the March 1998 ballot for voter approval. The tax will be a special tax and will require a 2/3 vote in order to pass. The Army Corps of Engineers is finalizing their project design and completing a Draft Supplemental Environmental Statement/Environmental Impact Report which is anticipated to be released for public review and comment on December 15, 1997.

When environmental review and design details are completed, the project is subject to certification by the County Board of Supervisors (acting as the Flood Control District Board of Directors) and is also subject to endorsement by each of the jurisdictions affected by the project.



## **Relationship to Draft General Plan Process**

The flood control re-design process was underway at the time the Draft General Plan Documents were released for public review in October 1996. Several participants in the Coalition, including the Friends of the Napa River, commented that the DEIR for the Draft General Plan did not include the latest objectives developed by the group for the flood control design and that the General Plan was not organized to focus policies on river related issues. Since the referenced flood control project design has not been funded or adopted by the City it would be premature to include the detailed objectives into the General Plan at this time. Pages 8.25 and 8-26 of the Background Report, in concert with the supplemental text in this response, provide sufficient discussion of the status of the flood control project as a framework for development of the General Plan at this time. The draft General Plan is intended to provide long range planning for the City with or without flood control. If a flood control plan is adopted and funding becomes a certainty, the Council may wish to amend the General plan to incorporate supporting policies and implementation programs as suggested. It would be premature to anticipate an appropriate policy solution in the General Plan before a flood control project is a certainty.

Some comments focused on the Natural Resource objectives of the Flood Control Project referencing, again, the objectives of the “living river” concept. As mentioned above, the General Plan can be amended in the future to reflect the objectives and programs of an adopted project if the Council desires to do so. None of the draft General Plan policies preclude the implementation of a flood control design. Environmental protection policies are included in the Natural Resource, Land Use, and Health and Safety elements of the Draft General Plan to address riparian habitat, water quality and other issues that would enable the implementation of a living river strategy and support adoption of a future flood control project.

## RESPONSES TO INDIVIDUAL COMMENTS

### 1. Napa Chamber of Commerce October 15, 1996

#### 1.1G Commentator recommends the General Plan include an Economic Element.

**Response:** The City of Napa has included funding in the Fiscal Year 1997-99 Budget for the development of an Economic Element for the General Plan and intends to proceed with its implementation in FY 1997-98.

### 2. Friends of the Napa River October 17, 1996

#### 2.1G Commentator recommends General Plan incorporate guidelines for urban waterfront development prepared by Friends of the River.

**Response:** The Redevelopment Agency/City has begun the process of preparing design standards and guidelines for the areas between Imola and Lincoln, Silverado Trail and Main Street and Soscol Avenue in FY 1997-98. The Urban Waterfront guidelines prepared by the Friends of the Napa River will be reviewed and considered in the preparation of the design standards. This is an implementation of Policies LU-6.4, LU-6.8, LU-6.9, LU-6.10 on page 1-18 of the Draft Policy Document.

#### 2.2G Commentator recommends General Plan include a special appendix summarizing all policies and programs in the Plan relating to the Napa River watershed.

**Response:** Although not needed for General Plan adequacy, a special Policy Document Appendix under a category of special interest could be considered by the City Council. It should be noted that this type of appendix repeats the policies found in the Elements and creates a larger policy document.

#### 2.3G Commentator expresses concern that creeks are being impacted with additional storm water run off created by new development and supports keeping creeks open. The comment also asks what regulations govern development in the floodplain and whether these regulations should be made clearer.

**Response:** Table LU-2 on Page 1-14 of the Background Report summarizes existing land uses and vacant land available for development. It is assumed that there is infill development potential on both the vacant and the underutilized parcels within the RUL. Many of these sites are surrounded by existing development and are served by an existing underground storm drain network. Policies in the Draft General Plan (both Land Use and Natural Resource Elements) will support the concept of preserving and utilizing natural systems to reduce the impacts of new runoff on existing storm drain systems where new project sites are of a scale to feasibly integrate these techniques. Examples of recent projects which

incorporate retention ponds are the South Napa Marketplace and Silverado Creek. With regard to floodplain development, City Ordinance Chapter 17.62 and Policy Resolution No. 27 establish Floodplain Management Regulations and require grading and drainage plans minimizing stormwater impacts for individual project proposals.

- 2.4E** Commentator refers to the DEIR page 3.7-8 # 3 and expresses concern for the ambiguity in interpreting Land Use Policy 9.3 and related policies.

**Response:** The policies referenced in the DEIR are listed under Goal LU-9 in the Land Use Element. This goal recognizes the environmental setting and natural resources that remain in the city and that the urban form should remain flexible in responding to the constraints and opportunities presented by the remaining resources. The policies are intended to allow flexibility in setting standards for development when environmental information demonstrates that important resources are present. As stated in the first two paragraphs on page 2 of the Policy Document, state law requires that actions and decisions concerning both private and public projects be consistent with the policies of the General Plan.

- 2.5G** Commentator feels the narrative description of natural resource and flooding issues is better than the related policies.

**Response:** There is no reference to specific text or policies in this comment, making a direct response difficult. If the commentator has specific suggestions for modifying the policies in question, these should be presented to the City Council for consideration during hearings on the Draft General Plan.

- 2.6E** Commentator questions the changes proposed for the Stanly Ranch, the potential for significant impacts and requests that the floodway areas of the Stanly Ranch be considered open space.

**Response:** *See Standard Response Stanly Ranch.* The Stanly Ranch is not being "rezoned" by the General Plan. The text in the last paragraph on page 1-7 of the Draft General Plan Policy Document states that "Prior to any development in this Planning Area [Stanly Ranch], a specific plan is required." The Specific Plan process will involve a comprehensive review of a development proposal and its related environmental impacts in an EIR before any final decision on the distribution of land use through zoning is made.

- 2.7G** Commentator asks why there isn't a conservation element for maintaining, enhancing, restoring, and *creating* riparian and wildlife corridors?

**Response:** Conservation policies are included in the Natural Resource Element that address vegetation types and wildlife habitat corridors. Goal NR-1 (pg. 7-4) is focused on managing natural resources and preserving and enhancing plant and wildlife habitats. Policies NR1.1 through NR-1.13 are intended to provide for the maintenance, enhancement, restoration and creation of riparian and wildlife habitat and corridors and the Implementation Programs on pages 7-5 and 7-6 indicate that the City is intending to undertake certain tasks within the next 5 years to implement these conservation policies. Policies in other elements also incorporate conservation practices in recognition of the policies in the Natural Resource Element. For example, Land Use policies for maintaining the RUL are intended to conserve resource, open space and agricultural lands in the unincorporated areas of the County; The Land Use Designations and densities for residential development represent a reduction in density in certain areas as a result of site specific analysis of environmental constraints during General Plan data collection; Goal LU-9 on page 1-21 and its related policies specifically recognize the need for the urban pattern to respond to the environmental setting and natural amenities because they enhance the livability of the city.



### **3. Friends of the Napa River** **October 18, 1996**

- 3.1G** Commentator submitted guidelines inadvertently left out the packet accompanying the October 17<sup>th</sup> letter (comment letter 2).

**Response:** *See Standard Response Flood Control and Response to Comment 2.1G.* Guidelines are noted and attached to Comment Letter 2. The policy recommendation that the guidelines be incorporated in the General Plan can be presented to the City Council during hearings on the Draft General Plan.

### **4. Napa Chamber of Commerce** **October 15, 1996**

- 4.1G** Commentator acknowledges the need to proceed with the General Plan as scheduled but seeks a budget commitment for an Economic Element prior to the adoption of the General Plan so that such an element can be prepared and added to the Plan soon after its adoption.

**Response:** *See Response to Comment 1.1G.*

### **5. Louise Clerici** **October 28, 1996**

- 5.1E** Commentator points out apparent conflict between the Draft EIR for the General Plan and the EIR for the Big Ranch Specific Plan concerning the impacts on future water supply.

**Response:** *See Standard Responses for Water Supply, CEQA Applications to General Plans and Big Ranch.* The two documents do have conflicting environmental conclusions regarding water supply and reflect the interpretation of two different environmental consultants. The General Plan DEIR has been revised to expand the analysis of water supply impacts to find water supply impacts potentially significant during times of drought.

- 5.2E** Commentator points out apparent conflict between the Draft EIR for the General Plan and the Draft EIR for the Big Ranch Specific Plan concerning the significance of impacts on future wastewater treatment capacity.

**Response:** *See Standard Response Wastewater.* The two documents do have conflicting environmental conclusions regarding wastewater treatment capacity and reflect the interpretation of two different environmental consultants. The General Plan DEIR has been revised to find wastewater treatment capacity significant based on the existing NSD facility; however, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a “will-serve” letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant.

**5.3E Commentator asks for clarification of DEIR Figure 2-2 concerning the designation of two areas.**

**Response:** The two areas in question as shown on Figure 2-2 of DEIR are both county parcels within the RUL but located outside the sphere of influence; therefore, both the shading and vertical line treatment shown in the legend have been applied.

**5.4E Commentator asks who is proposing to extend the RUL?**

**Response:** *See Standard Response RUL.*

**5.5E Commentator points out apparent conflict between statements in the DEIR that reference the amount of available acreage for future development in the RUL.**

**Response:** An inventory of land use in the RUL was conducted by planning staff in 1992. The inventory was conducted on a parcel by parcel basis and land was categorized as shown on Table LU-2 in the Background Report. At the time, small parcels of vacant land and developed parcels with additional development capacity were inventoried in a separate category from short term agricultural uses (parcels over one acre with at least one existing dwelling). As stated in paragraph 3 on page 1-15 of the Background Report: "When land in short term agricultural use is factored in, several additional sites are added to the inventory of "vacant" lands potentially available for development." Table 1-1 on page 1-3 of the Policy Document estimates the combined total of underdeveloped and agricultural land area currently existing in the RUL. The text in question on page 3.6-2 of the DEIR refers to the visual character of infill development. In this case, the reference to 858 (438 considered developable) acres of vacant land is appropriate since it represents vacant "infill" land surrounded by existing development. The text on page 3.9-3 of the DEIR uses the combined estimated vacant land figure of 1,037 acres within the RUL for the purposes of evaluating the potential impacts to groundwater recharge, an environmental category that requires a theoretical estimate of additional impervious surface that might result from new development in the RUL.

**5.6E Commentator points out that the DEIR erroneously references Table NR-1 in the Draft General Plan Background Report.**

**Response:** The text of the DEIR has been revised to correctly reference only Tables NR-2 and NR-4.

**5.7E Commentator suggests simplified page numbering system for DEIR.**

**Response:** The suggestion is appreciated; however, the page numbering system used in the DEIR and in the General Plan Documents is used in these type of reports to assist the reader in tracking the chapter, page, and, in some cases the subject matter for reference purposes.

**6. California Department of Forestry and Fire Protection (CDF)  
October 14, 1996**

**6.1E No Comments submitted on DEIR**

**Response:** No response necessary.

## 7. Napa Valley College November 12, 1996

### 7.1G Commentator points out that the Draft General Plan Background Report does not show enrollment trends for Napa Valley College.

**Response:** The Draft Background Report will be revised to include the following information provided by Napa Valley College:

NAPA VALLEY COLLEGE ENROLLMENT TRENDS - 1990 to 1996		
<i>Semester/Year</i>	<i>Students</i>	<i>% Change</i>
Fall 1990	6,991	--
Spring 1991	7,062	1.0%
Fall 1991	7,328	3.8%
Spring 1992	7,243	-1.2%
Fall 1992	7,102	-1.9%
Spring 1993	6,319	-11.0%
Fall 1993	6,248	-1.1%
Spring 1994	6,264	0.3%
Fall 1994	5,932	-5.3%
Spring 1995	6,074	2.4%
Fall 1995	5,669	-6.7%
Spring 1996	6,104	7.7%
Fall 1996	5,767	-5.5%

*Source: Napa Valley College 4/30/97*

### 7.2G Commentator asks for clarification regarding the number of high school students attending community college in Table CS-8.

**Response:** The Draft Background Report will be revised to include the following information:

- 441 students were enrolled in both a local high school and Napa Valley College in Spring 1997
- 298 students that graduated from a local high school went on to attend Napa Valley College in 1996



## 8. Metropolitan Transportation Commission November 14, 1996

### 8.1.E Commentator points out that the DEIR does not analyze traffic impacts outside the city limits and asks for analysis of traffic impacts on Route 29 North and South of the city limits.

**Response:** Determining the external impacts of growth for an area as large as the City of Napa is difficult since technically it is not possible to attribute specific impacts solely to the city. Impacts outside of the city are attributable to three major sources:

- Growth within the city
- Growth outside the city
- Growth in travel demand between locations outside of the city

With regard to growth within the city, a significant increase in travel outside the city would not occur without growth outside the city. For the real-world condition where there would be growth throughout the sub-region, it is difficult to attribute impacts just to the city, since trips with ends both in and out of the city are partially attributable to each. Thus, it is not proper to simply compare 1992 (base year) conditions to 2020 buildout conditions and attribute all of the impacts to the city.

In other work for projects in Napa County, particularly for the Napa County Congestion Management Agency, eight representative intersections outside the city have been evaluated. In response, Dowling Associates evaluated these intersections for the following conditions:

- Existing conditions
- A combination of 2020 land use in the City of Napa and 1992 land use outside the city; this represents the "existing-plus-project" impact in that it holds outside conditions constant. However, it does not represent a real-world condition in that, even if there is no growth within Napa County outside the city (which this scenario is intended to represent), there would still be a growth in external-external traffic (such as that between Solano and Sonoma Counties, which in fact represents the largest component of traffic growth within the County)
- A combination of 1992 land use within the city of Napa and 2020 conditions outside the city. This represents a cumulative scenario "base case," representing the external events that would occur outside of the city in the year 2020
- A 2020 forecast, using 2020 land use and external travel patterns for all conditions. This represents the so-called "cumulative scenario."

In order to prepare this supplemental analysis, it was necessary to make one set of assumptions that differs from all other model runs made to date using the Napa County Travel Forecasting Model. In all other runs, the control totals for traffic at the gateways to the county were derived using Metropolitan Transportation Commission (MTC) travel model estimates as controls; the MTC model estimates were used to determine growth factors on existing volumes to derive the gateway controls. In those cases, however, Dowling was preparing a composite estimate for a particular target year (i.e. a 2000 forecast or a 2020 forecast). In this case, Dowling prepared scenarios for the specific purpose of determining impacts, and have used combinations of data for 1992 and 2020. In order to reflect the fact that some internal Napa traffic will be destined for areas outside the county, it is necessary to derive some type of methodology to determine how much additional traffic might go outside the County with this type of combined data. The technique used has been to determine the growth rate between 1992 and 2020 for internal Napa County traffic, and to factor the gateways up by that proportion. Thus for the scenario composed of 2020 land use within the city and 1992 outside the City, the gateway volumes were increased by 14%, representing the total contribution of 1992-2020 growth within Napa County to traffic compared

to 1992. For the scenario where 2020 land use was used within the city of Napa and 1992 land use used outside the city, the gateway volume were increased by 27%.

Table 1 below will be inserted as Table 3.3-4 in the Revised Draft EIR. The table documents the numerical results of this analysis by reporting Service Level at each of the eight intersections for the four scenarios described above. The 1992 scenario uses the 1992 highway network; the remaining scenarios use the 2020 network. Note that since 1992, improvements have been made to the intersections of SR 29/Airport Boulevard and SR 29/Kelly Road; as a result, improvements are seen for the scenario which combines 2020 land use in Napa and 1992 in the remainder of the county.

Looking at the first two data sets in Table 1, which represent existing conditions and existing plus project conditions, it can be seen that the Service Levels with the project are the same or improved as the existing conditions. When a comparison is made between the second two data sets, which represents the cumulative situation, it can be seen that the service levels are the same except at the intersection of American Canyon Road and SR 29, where the Service Level would decline from D to E. Thus, for the existing plus project scenario, the Draft General Plan would have no significant impacts on the major roadways in Napa County that lie outside the City. For the cumulative scenario, there would be a projected degradation of traffic at one intersection, American Canyon Road & SR 29. This degradation would still be within the Napa County CMA's standard for this facility. The major expected changes in service level between 1992 and 2020, at SR 12/29/Airport Boulevard, would be caused largely by the increase in traffic between Sonoma and Solano Counties.

The DEIR text has been revised to incorporate this analysis.

**Table 1 -- Comparison of External Traffic Conditions**

Intersection	Service Level	Average Delay (Secs.)	Volume/ Capacity Ratio
<b>1992 Existing Conditions</b>			
#1012 Oak Knoll & SR 29	B	7.4	0.479
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	11.7	0.73
#4372 SR 12 Kelly	F	267	1.515
#4373 SR 29 & SR 12	F	496	1.662
#4864 SR 29 & Rio Del Mar	A	4.4	0.696
#4897 SR 29 & Pope (St. Helena)	B	11.3	0.711
#4916 SR 29 & American Canyon	C	21.6	0.893
<b>2020 in Napa - 1992 Outside</b>			
#1012 Oak Knoll & SR 29	B	7.2	0.554
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	B	11.8	0.791
#4373 SR 29 & SR 12	C	22.3	0.924
#4864 SR 29 & Rio Del Mar	A	4.1	0.573
#4897 SR 29 & Pope (St. Helena)	B	11.1	0.673
#4916 SR 29 & American Canyon	C	17.4	0.707
<b>1992 in Napa - 2020 Outside</b>			
#1012 Oak Knoll & SR 29	B	7.9	0.624
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	19.6	0.957
#4373 SR 29 & SR 12	F	205.1	1.393
#4864 SR 29 & Rio Del Mar	B	5.5	0.832
#4897 SR 29 & Pope (St. Helena)	F	75.4	1.174
#4916 SR 29 & American Canyon	D	37.0	1.018
<b>2020 Cumulative</b>			
#1012 Oak Knoll & SR 29	B	8.4	0.659
#4320 Madison & SR 29	B	6.7	0.672
#4321 SR 29 & Adams (St. Helena)	B	10.8	0.604
#4372 SR 12 Kelly	C	18.8	0.948
#4373 SR 29 & SR 12	F	273.5	1.48
#4864 SR 29 & Rio Del Mar	B	5.7	0.837
#4897 SR 29 & Pope (St. Helena)	F	85.1	1.195
#4916 SR 29 & American Canyon	E	45.4	1.058



## **9. Napa Sanitation District November 14, 1996**

- 9.1G The commentator provides several corrections to the Draft Background Report discussion of wastewater collection and treatment.**

**Response:** The suggested corrections will be made to the Background Report prior to its adoption.

- 9.2G Commentator suggests Policy CS-9.3 be revised.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

- 9.3G Commentator suggests revision to the Policy Document text discussion of wastewater treatment facilities.**

**Response:** The suggested correction will be made to the Policy Document prior to its adoption.

- 9.4G Commentator suggests revision to the text discussion of sludge disposal and water reclamation.**

**Response:** The suggested revisions will be made to the Policy Document prior to its adoption.

- 9.5G Commentator suggests revision to the text discussion of possible reclaimed water use by Stanly Ranch.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

- 9.6E Commentator recommends mitigation measure (Policy CS 9.3) be revised.**

**Response:** *See Response Comment 9.2.*

- 9.7E Commentator feels that impacts under Wastewater Treatment, Storage, and Disposal should be classified as significant.**

**Response:** *See Standard Response Wastewater.* The General Plan DEIR has been revised to find wastewater treatment capacity significant based on the existing NSD facility; however, the City is proposing an additional mitigation in the form of a policy that would require that all new applicants for development secure a "will-serve" letter from the NSD if the District notifies the City that a critical capacity situation exists. The mitigation would reduce the impact to less than significant.

- 9.8E Commentator suggests revisions to the text discussion of wastewater treatment facilities.**

**Response:** The text of the DEIR has been revised as suggested.

- 9.9E Commentator suggests alternative language for significance criterion under wastewater.**

**Response:** *See Standard Response Wastewater.* The text of the DEIR has been revised to read: "A significant impact would occur if new development authorized by the General Plan generated wastewater flows that exceeded the existing or planned wastewater treatment, storage, and disposal capacity of the Napa Sanitation District's system."

- 9.10E Commentator feels the impact conclusion should be changed from "Insignificant" to "Significant" and suggests modifications to the discussion that follows.**

**Response:** See Response to Comment 9.7.

- 9.11E Commentator offers corrections to text on page 3.12-1 of DEIR concerning hazardous material.**

**Response:** The DEIR text has been revised as suggested. The County Department of Environmental Management has confirmed that sulphur dioxide gas and chlorine are no longer in use at Imola and Soscol wastewater treatment plants and therefore these facilities are no longer considered the two highest ranking facilities within the City and County of Napa. (4/24/97 Phone Con w/ Kerrie Fergus, Env. Mgmt.)

- 9.12E Commentator provides explanation of Phases 1 and 2 of treatment plant upgrades.**

**Response:** The DEIR text has been revised as suggested.

- 9.13E Commentator suggests that General Plan and EIR needs to provide projections of future wastewater flows.**

**Response:** *See Standard Response Wastewater.* The NSD/ACCWD 1990 Master Plan Update contains wastewater generation estimates of new development within the RUL through the year 2012. The City of Napa feels it is NSD's responsibility as part of its master planning to develop and periodically update wastewater flow projections, which include inflow and infiltration, for individual service areas (e.g., the RUL) and all areas expected to contribute flows to the Soscol Treatment Plant.

- 9.14E Commentator provides clarification concerning the capacity of the Soscol Treatment Plant.**

**Response:** The DEIR text has been revised as suggested.

- 9.15E Commentator provides information on the City of American Canyon's future wastewater treatment needs.**

**Response:** The DEIR text has been revised as suggested.

## **10. Napa County Congestion Management Agency November 18, 1996**

- 10.1G Commentator references Policy Document and seeks clarification of the land use scenario that was used in the traffic projection model.**

**Response:** Table 1-2 in the Draft Policy Document was prepared from a different source than the data used for travel forecast modeling. However, they were intended to be compatible. For comparative purposes, see the table below. It should be noted that the differences at 2020 are less than 1%, and that given the other variables over a 20+ year period, this is a reasonable difference for long range, theoretical planning purposes.

Comparison of Housing Totals		
	Draft Policy Document Table 1-2	Travel Model Data
1992 Existing	27,098	27,255
Added to 2020	7,840	7,369
Total 2020	34,938	34,624

**10.2G** Commentator references Policy Document and makes observations regarding scenic corridors.

**Response:** Comment noted, no response required.

**10.3G** Commentator references Policy Document and makes observations regarding project financing.

**Response:** Comment noted, no response required.

**10.4G** Comment compliments introductory text of Transportation Element.

**Response:** Comment noted, no response required.

**10.5G** Commentator suggests showing the remainder of Trancas and the portion of Silverado on Figure 3-1 to avoid confusion.

**Response:** Comment noted; Figure 3-1 will be revised.

**10.6G** Commentator refers to the Policy Document, Table 3-3 and clarifies that State Route 29 is presently rated as a freeway by Caltrans from north of the intersection of 29/12/121 to one-quarter mile north of Lincoln and that with the construction of the 29/Trancas interchange, the designation will move to north of Trancas but below Trower. Further, the freeway section will not move south of the 121/12/29 intersection as the Table shows.

**Response:** The text will be changed to read as follows: “ State Route 29 from the intersection of SR 29/12/121 to Lincoln Avenue (extending to north of Trancas Street upon completion of the SR 29/Trancas interchange).”

**10.7E** Comment questions the extent that the impact analysis included consideration of projects beyond the City’s RUL.

**Response:** Comment noted; *See Response to Comment 8.1.*

**10.8E** Commentator refers to Policy Document and Implementation Programs on Page 3-11 and to page 3.3-6 of DEIR and observes that the two project lists are not consistent.

**Response:** The text on page 3-11 of the Policy Document should be changed to reflect Table 3.3-3 in the Draft EIR. The comment regarding one project lying outside the City is not specific enough for a response.



**10.9G The commentator requests that the City apply State Standards as policy for Caltrans intersections within the City.**

**Response:** Policy T-2.1 is intended to state the Service Level Goal of the City of Napa. The exclusion of one specific intersection that is at least partially under the control of CALTRANS is not related to the fact of shared control but rather to the fact that this specific intersection - Trancas/Redwood - is congested beyond the desired standards and will not be improved until all parties involved come up with a financing plan; the exemption is intended to recognize this real-world fact. With regard to other intersections where CALTRANS has partial jurisdiction, the City's policy remains a goal and may or may not coincide with CALTRANS desires. The City's goal represents the City's objective, and it is clearly recognized that as problems occur or improvement projects are proposed, the two parties will engage in the time-honored exchange of working out a plan that meets the desires and funds available to all parties.

**10.10G Commentator suggests the City change its method of evaluation to include the examination of roadway segments as well as intersection operation.**

**Response:** Policy T-2.3 will be changed to eliminate the phrase "and street segments." Within a developed city, signalized intersections are the dominant control on capacity; segments are only of concern on freeways or on unsignalized highways such as those which lie outside of the City. Since freeways are clearly not within the jurisdiction of the City, limiting evaluation to intersections will provide a suitable framework for analysis and evaluation of impacts on the system.

**10.11G Comment suggests changes to Crucial Corridor policies.**

**Response:** The comment is respectfully acknowledged; however, the crucial corridors policies have been a unique and particular focus of the City of Napa since the 1982 General Plan. The text in these sections follows that which has been policy for many, many years. Implementation of the crucial corridor policies and accompanying Traffic Impact Zoning Overlay has proven successful in accomplishing the purpose of maintaining efficient community wide circulation on these major corridors as demonstrated in the existing conditions LOS data in the DEIR. These policies provide the City the discretion to impose additional requirements on the intensity of uses, site design and parking, and even to deny a use if it is shown that it would reduce the efficiency of traffic movement on the crucial corridor.

**10.12G The commentator suggests extending the Crucial Corridor designation of Trancas beyond Big Ranch to Silverado Trail (SR 121).**

**Response:** The extent of the recommended extension of the Crucial Corridor designation of Trancas Street to Silverado Trail would extend it beyond the City's jurisdiction. The comment is well taken, however, and the Policy Document will be revised to extend the Trancas Crucial Corridor to the Napa River, which forms the edge of the RUL just to the east of the Trancas Street/Soscol Avenue intersection.

**10.13G The commentator suggests that Crucial Corridor policies in certain areas be rewritten to increase parking requirements.**

**Response:** The Traffic Impact Zoning Overlay, which implements the Crucial Corridor policies of the General Plan requires an increase in on-site parking by 20% for projects adjacent to Crucial Corridors. The City has found this to be an adequate, reasonable and effective means of addressing potential parking impacts on Crucial Corridors.

**10.14G The commentator questions whether traffic calming policies will be effective and offers opinion regarding the most effective methods.**

**Response:** Comment noted, no response required.

**10.15G The commentator encourages revisions to the phraseology of TDM policy text and suggests the addition of implementation programs.**

**Response:** No response required. See Policy Document page 3-20, Implementation Program T-5.B.

**10.16G Commentator indicates that text could be revised to reflect recent adoption of County Bicycle Plan.**

**Response:** The text for the second paragraph of page 3-21 of the policy document will be changed to reflect the fact that the County Bicycle Plan has been adopted.

**10.17G The commentator requests that the implementation time frame for a demonstration project for bicycle friendly intersection controls and for publication of a bicycle route map be shortened from the 1998-2000 time frame indicated in the draft Policy Document.**

**Response:** The demonstration project is in the process of being designed and is scheduled for completion by the end of 1997. Implementation program T-6.F regarding a bicycle route map, is anticipated to be completed within one year from the date of adoption of the General Plan. It should be noted that the time frames indicated in the draft Policy Document are subject to consideration by the City Council during hearings on the General Plan. The timing of programs is based on funding and staffing priorities; the 1998-2000 time frame for implementation has generally been recommended for the higher priority programs.

**10.18G Commentator refers to page 1-21 of the Background Report and recommends the City request the State to officially designate SR29 a scenic highway.**

**Response:** In Policy LU-1.6, on page 1-8 of the Policy Document, the City designates SR 29, SR 121 and SR 221 as scenic corridors, promoting utility undergrounding, landscaping and other improvements to enhance their appearance and the community identity. This policy implies support for official State designation of these highways. Specific language to that effect could be added by the City Council if they so desire during their consideration of the Draft General Plan.

**10.19G Commentator questions consistency of growth projections used in General Plan Update traffic modeling with growth projection used in the CMA traffic modeling.**

**Response:** The text in the final paragraph on Page 1-29 of the Draft Background Report will be changed to read as follows:

In 1992, the City of Napa and the Napa County Department of Public Works jointly funded the development of a travel forecasting model to be used for diverse purposes in the County. The City desired and has since used the model for its General Plan Update; the County Department of Public Works subsequently transferred the model to the Napa County Congestion Management Agency. The CMA portion of the model has subsequently been updated to reflect 1994 ABAG land use control totals, whereas the General Plan work has continued to use the 1992 model and data as a basis. Other than the basis of land use, the models are intended to be as compatible as possible given the different goals of the two respective users. Land use data in the Napa General Plan data portion of the model represents a combination of 1992 City Land Use data plus (for 2020) the increment projected for build-out of the plan. It also includes estimates provided by the County Department of Conservation, Development and Planning for those portions of the County outside the City.

**10.20G Commentator clarifies that 2020 projection figures shown in the Background Report on Page 1-34,**



**Table LU-3 were generated by the City of Napa Planning Department.**

**Response:** Comment acknowledged. The projections to 2020 were made by the Planning Department based on trends shown by the ABAG numbers. The footnote does refer to City of Napa Planning Department as shared source of information.

**10.21G Commentator questions assumptions concerning commute patterns.**

**Response:** The commentator poses a number of questions that, if answered in the implied detail, would produce research data on travel within Napa that is beyond the scope of that required for General Plan purposes. The intended point of the referenced text is that "less than half of all trips on city of Napa streets originate and end within the City". The statement is simply intended to indicate that with regard to traffic, Napa is not an island but is in fact part of a larger urban fabric. Providing exhaustive answers to each of the questions in this section would not, in the view of the authors of the EIR, add any clarity to the document. The authors would note that the statement is intended to apply to all roadways in Napa, not just City streets, and that the data come from an analysis of travel patterns, not individual streets. Answers to these questions can be derived from MTC modeling data, as such travel forecasting is more appropriately handled at a regional level.

The commentator also asks what the plan does to eliminate or reduce the "cross-commute." The authors have not located that precise term within the document, and could interpret either of two specific meanings. If the term refers to commuters crossing Napa County from Solano to Sonoma or vice-versa, there is little the City could do, since this is a sub-regional movement. If the question is about people living in Napa and working elsewhere, and vice-versa, this is the great problem facing all growing urban areas. It is a problem that cannot be dealt with by a single city, as it reflects the interaction between housing costs, location of jobs, and the complete flexibility of people to live anywhere and work anywhere regardless of the amount of time required for travel. Because no agency has control on the latter, and because the use of time is the most crucial and variable element in the travel process, there is very little that any government agency - city, county or regional - can do. Even the acknowledged desire to balance jobs and housing, which is a confirmed component of both City and County plans, will not provide a solution to the problem so long as the individual is allowed to maximize his housing value while the public subsidizes his real travel costs. Until this issue is dealt with at a Statewide or at least regional level, no policy at the local level will have a major impact. The Napa County CMA is in a better position to influence regional transportation policy than the City.

**10.22E Commentator asks for more information on performance of segments, not just intersections.**

**Response:** *See Response to Comment 10.10.*

**10.23E Commentator raises concerns about the level of service at the 221/29 intersection.**

**Response:** The Napa County Congestion Management Program prepared by Cambridge Systematics, Inc. in June 1992, reported the Service Level at SR 221/29 to be F. The model was calibrated at that time to reflect the LOS F condition, and to the best of our knowledge, those computations have remained in place in all work produced by Dowling Associates, including work for the Napa County CMA. If the Service Level has indeed changed, that information was not delivered to Dowling Associates until this letter. All of the prior work has been driven by the need to maintain consistency with prior efforts, and this location is one of those governed by that focus. The LOS reports in the General Plan EIR reflect consistency with the original calibration.

With regard to impacts in other areas of the County, please see *Response to Comment 8.1*



**10.24E Commentator concurs with statement in DEIR that a CMP analysis of the General Plan is not required.**

**Response:** No response required.

**11. The California Native Plant Society  
November 16, 1996**

**11.1G Commentator poses several rhetorical questions.**

**Response:** Comment noted. No response necessary.

**11.2E Commentator questions build out calculations and their relationship to a popular vote in the 1970s for a population cap of 75,000. Comment is also made regarding the relationship between dwelling units, population and household size and whether the DEIR considers the appropriate buildout potential.**

**Response:** Page 5 of the Draft Policy Document explains the background of the plebiscite that resulted in the 75,000 population figure as follows:

*"In 1973, following state legislation to allow advisory ballot measures, the City Council placed questions on population growth (known as the "plebiscite") on the November ballot. Of the choices available, the option with the least population increase (75,000) was selected by the voters as the city's preferred size. The City Council adopted a new general plan in 1975, less than two years after the plebiscite. Consistent with the advisory ballot measure, the plan projected a year 2000 population of up to 75,000 and contained urban development within an urban growth boundary dubbed the Residential Urban Limit Line (RUL)."*

The 75,000 population was used in the 1970's for planning to the year 2000. Population data over the last 20 years show that the contained growth policies adopted with the 1975 plan were effective in limiting population growth; current projections anticipate a population of 72,250 by the year 2,000 (2,750 less than the voter recommended limit for 2000). The Draft General Plan looks to the year 2020 as a planning horizon and maintains the same fundamental contained growth policies that were initiated in the 1975 Plan. The 2020 population projection of 81,140 shown in the Draft General Plan is based on the belief that these same policies will continue to maintain a conservative growth rate with an overall rate increase of less than 1% per year between the years 2000 and 2020.

The text under "Growth Forecasts for the Year 2020" on page 2-13 of the DEIR explains that the number of projected dwelling units for 2020 is derived from the residential capacity analysis method developed by the CAC (Citizen's Advisory Committee). This method is explained in Appendix C of the Draft Policy Document. The 2020 population is derived from straight line projections based on the trends shown in the ABAG population projections from 1980 to 2010. Recognizing that demographic trends affect household size over the planning period (see discussion on page 10 of Draft Policy Document) a static household size is not assumed over a 25 year period. The 2020 projections are intended to provide a guide for policy planning purposes and may or may not "come true" based on the variables (both internal and external) that affect a city's population, economy, and land use decisions over a 25 year period. The CAC established the 2020 projections to be used for planning purposes for the next 25 years and the Council

confirmed these projections in the Concept Report. CEQA requires that the Draft EIR provide a program level analysis of the possible impacts that might result from the maximum development anticipated by the Draft General Plan. The purpose of the DEIR is not to determine whether the General Plan correctly forecasts the future.

The introductory text on pages 12 and 13 of the Policy Document provides additional information regarding growth projections and states that “..... build-out capacity already takes into account reductions in development potential due to environmental constraints and other factors, this General Plan is not predicated on the assumption that reaching this theoretical “capacity” is either achievable or desirable. Instead, this plan is based on reasonable expectations regarding the amount of development actually likely to occur.....”.

- 11.3E Commentator refers to a phrase under the cumulative impact discussion of biological resources on page 4-5 of the DEIR and notes that the Draft General Plan does not present an estimate of the area or nature of additional parks and open space to be retained after full build out.**

**Response:** The referenced DEIR text on page 4-5 discusses the cumulative benefit of the Draft General Plan policies with regard to biological resources in Napa County. This paragraph concludes that the containment of urban development will preserve the overall land use pattern of the region thereby minimizing disturbance of native grasslands, wetlands and other sensitive biological communities and habitats in the Napa region. The commentator appears to relate this section of the DEIR to the buildout within the RUL anticipated by the General Plan and asks what quantity and quality of parks and open space (implying that these areas will retain native grassland and wetlands) will be retained after the maximum residential and commercial development has occurred. Page 3.7-1 through 3.7-9 of the DEIR provides the impact assessment of biological resources related to development contemplated by the Draft General Plan and includes references to policies in the draft plan that serve as mitigation measures. A description of habitats, including listings of sensitive plant and wildlife species is included in the General Plan documents and in the DEIR. Parkland acreage figures are included in the Parks and Recreation Element of the Draft Policy Document.

- 11.4G Commentator raises several objections to the designation of Stanly Ranch for development.**

**Response:** See Standard Response Stanly Ranch. This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

- 11.5E Commentator refers to page 3.6-3 of DEIR that references Policy LU-6.4 which promotes riverfront development that reorients downtown to the Napa River. Commentator feels the policy is inappropriate and that biological values and riparian habitat be promoted and riverfront development be limited.**

**Response:** The analysis and conclusions on page 3.6-3 of the DEIR is in the context of the visual setting in the downtown area. The draft policies referenced do not preclude the restoration of riparian vegetation where possible. If these policies were eliminated, redevelopment of riverfront properties in the downtown could occur in the same pattern as currently exists (backs to the river) without the strength of the General Plan to support the exploration of other opportunities during development review. Policy NR-1.1, NR-1.3, NR-1.4, NR-1.5, NR-1.6, NR-1.8 and related implementation programs in the Natural Resource chapter of the Draft Policy Document address the preservation and restoration of riparian vegetation.

- 11.6E Commentator refers to the occurrence of vernal pools north Green Island Road (page 3.7-2 of the DEIR) and in the Big Ranch Road and Foster Road areas and feels protections should be determined with the General Plan.**



**Response:** The vernal pools known to exist north of Green Island Road are outside of the city limits and the RUL and would not be affected the City's General Plan policies. It should be noted however that the City has designated some of the land in this vicinity as Greenbelt to establish the clear policy desire regarding County development in these areas. The policies under goals NR-1 and NR-2 of the Natural Resource Element generally address habitat and vegetation protection in all categories, including vernal pools. Vernal pools are not specifically identified in the policy text; however they would be considered a form of wetland (as described in the Background Report on page 7-6) and subject to the policies of the Plan as well as very specific state and federal regulations when a project level environmental assessment is undertaken. In the case of the Big Ranch area, the recently adopted Big Ranch Specific Plan includes policies that require confirmation by CDFG and the Corps of satisfactory mitigation as part of the environmental review process for specific development applications.

**11.7E Commentator points out that the DEIR does not state the importance of preserving wildflower fields and feels a mitigation bank should be established.**

**Response:** The commentator was contacted in order to clarify the location of any known sites of rare or endangered vegetation types. As a result of the discussion it was found that the area of greater concern to the commentator is the area east of Foster Road and West of Highway 29; and that reference to the Foster Road RUL adjustment was thought to be in this area -- which it is not. The concern is based on the commentator's observation of the plant communities in the area east of Foster Road; however there is no record or specific location of rare or endangered plants, including wildflowers, in the Foster Road RUL adjustment area or in other locations in the vicinity. The publication referenced in the comment was obtained and reviewed, and consists of a listing and description of all terrestrial natural communities in California. No specific site references are given in the publication relative to Grasslands and Wildflower communities in Napa; however, the descriptions would indicate that these plant communities exist in isolated vacant areas within the RUL. It is hoped that by confining urban development within the RUL, pursuant to the policies in the Draft General Plan, the County can pursue policies that would protect and enhance remaining and significantly larger grassland, wildflower and other habitat areas throughout the County. *Also see Response to Comment 11.3.*

**11.8E Commentator feels the list of sensitive plant species is incomplete.**

**Response:** The DEIR preparers consulted the most recent references available from the California Department of Fish and Game and the U.S. Fish and Wildlife Service and supplemented with other biological references, including the 1996 Natural Diversity Data Base to compile the listing found in Table NR-1 (see DEIR Reference Section pg. 6-4). If the commentator has knowledge of any update in official designations or acknowledged occurrence of listed species in the planning area, this information would be helpful to the preparers of the General Plan. The reference in the comment does not provide the detail needed to verify the claim. It should be noted that special status species designation continually changes and that the listing in the DEIR is considered the best information available (acquired from recognized sources) at the time of DEIR preparation.

**12. Napa County Conservation, Development and Planning Department  
November 15, 1996**

**12.1E Commentator expresses concern about an apparent City policy shift in expanding the RUL, including a 40 acre parcel zoned Agricultural Preserve. Commentator feels this is growth inducing and not adequately discussed in the DEIR**



**Response:** *See Standard Response RUL.*

- 12.2E** Commentator expresses concern about the inclusion within the RUL of state property southwest of Imola Avenue and Soscol Avenue since it may reduce future options for County to address jobs and housing balance given the limitations imposed by Measure J.

**Response:** *See Standard Response RUL.* The City considers inclusion of the State Hospital, a non-agricultural use, within the RUL to be consistent with the intent of Measure J. The State Hospital is already within the City's Sphere of influence and is not designated as agricultural land. It should be noted that Measure J currently applies only to the County's General Plan, and is not a legal constraint on City land use decisions.

- 12.3E** Commentator expresses concern that DEIR does not address in a comprehensive way the development of the Stanly Ranch and its traffic impacts.

**Response:** *See Standard Response Stanly Ranch.* The Draft EIR addresses Stanly Ranch as it does all other potential development that could occur with the buildout of the General Plan: by including assumptions about the level of future development in the land use data base used for travel forecasting, and then producing an evaluation of traffic deficiencies and improvements needed to address those deficiencies. The statement on page 3-13 that there is "an inability to significantly expand roadway capacity" does not mean that locally focused projects can not be completed to mitigate some problems. In the case of the Stanly Ranch area, the Draft EIR includes, on page 3-13, an improvement project at the intersection of SR 12/29/121 that would provide for local widening to relieve impacts both for Stanly Ranch and other future growth. Table 3.3-2 indicates that this improvement would make a significant improvement to service level at this location, almost bringing the average delay back to 1992 conditions. Given that much of the traffic increase at this location is not Napa County generated, this would be an acceptable improvement. Other minor improvements to Stanly Ranch access would naturally be evaluated as part of a project-level EIR on that project; these improvements are not expected to be of such scope as to require an amendment to the General Plan. The authors note that the Policy Document will be corrected so that all projects on Pages 3.3-6 and 3.3-7 of the EIR will be included in the project list in the Policy Document.

- 12.4E** Commentator feels General Plan should include implementation programs for the city to fund its proportionate share of addressing road and intersection impacts outside city limits.

**Response:** *See Response to Comment 8.1* regarding impacts of city traffic outside the city of Napa. With regard to funding, it is very clear to all parties involved that funding is a crucial issue for transportation anywhere in California, and not just in the city of Napa or in Napa County. For a wide variety of reasons, there is currently not sufficient funding available to allow local jurisdictions to satisfy the measures of effectiveness or standards contained in the General Plans or other documents. Smaller counties such as Napa suffer in greater proportion since they have relatively less flexibility and significantly less political clout to obtain discretionary funds. Napa is particularly affected by the Bay Area funding mechanisms which allocate funds to counties on the basis of population and other socio-economic indicators. The biggest traffic problem facing Napa County is the rapidly increasing growth in traffic between Sonoma and Solano Counties. This growth is completely caused by those two counties, yet the impact falls on Napa County.

The statement that the City should provide for funding for improvements to facilities outside the City is a rather one-sided view of the world since, for exactly the same reason, the County and other cities, in and out of Napa County, should be providing funding for improvements within the City. This is a global issue, not a single jurisdictional issue. The proper approach would be a joint effort by all parties involved

to provide funding to respond to impacts anywhere in the County. This is one of the principal intents of the coordination programs overseen by the Napa County Congestion Management Agency. As it happens, the CMA is currently in the process of preparing a Deficiency Plan that will address these issues comprehensively, identify a certain set of improvement projects that may become implementable over time, and otherwise structure a county-wide response to the funding issue. All agencies in the County involved in transportation would best work through that mechanism rather than attempting to formulate individual, unrelated and uncoordinated responses to the funding issue.

The City is attempting to do its part in participating in the solution to these traffic problems. The DEIR has been revised to recognize the uncertainty of funding related to the feasibility of implementing traffic mitigations and has concluded that, without adequate funding, these remain potentially significant impacts.

**12.5E Commentator points out that the air quality analysis needs to reflect any changes made in response to above comments.**

**Response:** With inclusion of the Response to Comment 8.1, the City believes that traffic impacts are adequately analyzed and addressed at a general plan level. Since there are no new traffic conclusions resulting from the comments and responses, there is no need to revise air quality information in the DEIR.

**12.6G Commentator urges City to include implementation programs to cooperate with the County on housing development.**

**Response:** The City is one of only two jurisdictions in the county to have a certified Housing Element (American Canyon being the other). The Housing Element, adopted in 1991, has a time frame through June 1999 and, for this reason, was not updated as part of the comprehensive General Plan update. Many of the programs in the Element have already been implemented through the Housing Authority.

The commentator recommends policies and programs for inclusionary housing, an in-lieu fee program and for the implementation of AB 3456. The City Housing Authority is currently holding a series of workshops to explore the most favorable options for providing affordable housing in the city and inclusionary housing has been identified in these group sessions as a good way to integrate affordable units throughout the city. The outcome of these workshops will be the basis for updating policies in the Housing Element in 1999.

City officials are currently participating in the South Napa County Working Group to explore a solution to the provisions for housing for jobs created in the unincorporated area of the County.

**12.7E Commentator feels DEIR analysis of water supply impacts is inadequate and disagrees with the DEIR's conclusion that the water supply impacts are insignificant.**

**Response:** See Standard Response Water Supply.

**13. Napa County County Counsel  
November 18, 1996**

**13.1E Commentator feels the DEIR is inadequate in its failure to evaluate regional impacts and should be revised and recirculated.**



**Response:** These concerns are addressed in more detail elsewhere in this same comment letter. The DEIR has been revised and will be recirculated with these responses.

**13.2E Commentator points out that the DEIR does not adequately describe the regional setting.**

**Response:** *See response to Comment 13.11* where this concern is addressed in more detail.

**13.3E Commentator feels DEIR is inadequate in its failure to address regional effects in the area of air quality, water supply, wastewater treatment, and traffic.**

**Response:** These concerns are addressed in more detail elsewhere in this same comment letter.

**13.4E Commentator feels DEIR traffic analysis is inadequate in several specific impacts.**

**Response:** The commentator appears to misunderstand the material supporting the Draft EIR in all aspects of this comment. With regard to the South Napa Marketplace and the Lucky supermarket, these projects are included in the general terms of land use quantities that are used for the entire City. The South Napa Marketplace project actually came into being during the preparation of this General Plan, and data reflecting it are specifically included in the land use tables. Staff have reviewed the 2020 land use file with respect to the South Napa Marketplace project and note that the zone containing this project contains an increase of 540,000 square feet of general retail land use between the 1992 base year and the 2020 buildout year. There are small increases in other uses as well. This amount of land use exceeds the actual project as analyzed by Dowling Associates in a CMP conformity analysis dated January 19, 1993, which means that there is room for additional growth in that zone. Likewise, the Lucky Superstore was analyzed in a letter dated February 23, 1994 by Dowling Associates to the City. That letter showed a proposed increase of 35,000 square feet of retail use. Comparing the 1992 and 2020 General Plan data used in support of the General Plan, we find that the zone where the development is located contains an increase of 49,000 square feet of retail use, enough to accommodate the proposed development.

With regard to the Stanly Ranch project, *see the Response to Comment 12.3*. With regard to the issue of ABAG '96 projections, the commentator does not note a specific reference to that item, so it is not possible to comment directly on it. However, the following may be of interest. The City worked very closely with the Napa County Department of Conservation, Development and Planning (one of the signers of the commenting letter) to develop land use projections for the area outside of the County for the year 2010. Growth up to that year represents the best efforts of County staff to anticipate that amount of growth. To take the non-City data out to 2020, the consultant team used estimates of growth for Napa County prepared by the State Department of Finance and extrapolated the non-City data to 2020. This represents the best possible use of available data. Further, because of the way the travel model works, the land use data in the areas outside of the City do not need to be as precise as the data inside the City when the roadways inside the City are the primary focus of Environmental Review. Overall, the data pulled together cooperatively from all sources are sufficient to permit a valid analysis of 2020 conditions and the means by which the project has impacts within and outside of the City.

**13.5E Commentator feels the DEIR conclusion that traffic impacts are insignificant after mitigation is not supported by the DEIR analysis.**

**Response:** The DEIR text has been revised to expand impact analysis and to find some impacts significant or potentially significant. Concerning traffic impacts, potentially significant impacts could result where construction and the feasibility of funding of future traffic improvements are uncertain and/or outside the City's control. Regardless, the City intends to pursue every available means to obtain funding



for and schedule the timely implementation of improvements necessary to mitigate the development enabled by the Draft General Plan.

**13.6E Commentator feels the DEIR is inadequate in its failure to address cumulative impacts of reasonably foreseeable developments.**

**Response:** *See Standard Response RUL and Standard Response Stanly Ranch.* The development potential associated with the Stanly Ranch is included in the Draft General plan and was, therefore, considered and analyzed at an appropriate level in the DEIR. Development of the Lucky Supermarket and the remainder of the South Napa Marketplace Shopping Center was also reflected in the Draft General Plan and was, therefore, considered in the DEIR. Concerning the Airport Industrial Area, the DEIR assumed that development would occur consistent with the currently adopted Airport Industrial Area Specific Plan.

**13.7E Commentator feels the DEIR does not adequately address the growth inducing impact of designating Stanly Ranch and the RUL Adjustment area east of Big Ranch Road for development.**

**Response:** *See Standard Response RUL and Standard Response Stanly Ranch.* The City does not consider development of Stanly Ranch or the RUL adjustment area east of Big Ranch Road to be growth inducing.

With regard to the Stanly Ranch, it is already within the City Limits and has been slated for urban development for over 20 years. The SA land use designation of the 1982 General Plan does not indicate that development will not take place as the commentator implies, but that a specific plan will be necessary to determine the distribution of land uses and provision for infrastructure. The Draft General Plan continues the assumption that the incorporated land of the Stanly Ranch is appropriate for Urban development once a Specific Plan is prepared. General land use designations have been applied to demonstrate the maximum development envelope that was assumed for the area during preparation of the Draft General Plan and DEIR. It is anticipated that the land use designations will be further refined as a result of the Specific Plan process that was initiated by the property owners in May 1997.

Since the Draft General Plan does not change the circumstances that influence future development of the Stanly Ranch, it does not present a growth inducing condition. In terms of services, the Stanly Ranch area is already served by a 36 inch water main. It is not currently served by the Napa Sanitation District; however, the extension of wastewater service to an already incorporated area could not stimulate growth since the area is already slated for development by virtue of being within the City limits. The RUL surrounds the Stanly Ranch and the RUL policies applied to development will protect surrounding agricultural land from the pressure for further development. These long standing policies have proven effective in protecting the unincorporated agricultural and open space lands around the city for over 20 years.

With regard to the RUL adjustment area east of Big Ranch Road, the City does not believe that it will be growth inducing. As described in the Standard Response RUL, the City is endeavoring to establish a more defensive RUL line by using the same boundary criteria used in the County General Plan. Relocating the RUL to the line of riparian vegetation along the Salvador Channel provides a substantial visual and physical barrier which will better withstand the pressure for future urban expansion while providing a moderate amount of additional land for residential growth within the confined area of the RUL over the next 25 years. The scale of this expansion is considered minor compared to the long term protection of significant agricultural and open space land that will be achieved by establishing a defensible RUL boundary. It would be extremely difficult for existing services to expand beyond the localized extensions necessary to service this area.

It should be noted that the overall 2020 growth facilitated by the land use designations of the Draft General Plan (including the RUL expansion areas) is within the anticipated service needs for both the City's Draft Water Services Master Plan and the Napa Sanitation District Master Plan (See Standard Response Water Supply and Wastewater).

**13.8E Commentator feels the proposed expansion of the RUL is not adequately addressed as a conflict with the Napa County General Plan.**

**Response:** See Standard Response RUL and Standard Response Stanly Ranch. The City considers the proposed RUL adjustments moderate and sensible as explained in Standard Response RUL. The changes result in a more defensible line and affect such a small amount of agricultural land relative to the scale of the agricultural and open space setting that will remain protected on the perimeter of the RUL. The agriculturally designated properties are already parcelized in a pattern that precludes significant and viable agricultural development in the future. This is not considered to be a change in City policy.

**13.9E Commentator feels the City may no longer be willing to provide housing for new workers in the unincorporated area and this would be a substantial policy change that would represent a significant environmental effect.**

**Response:** The City has never had an adopted goal or policy to provide housing for jobs created in the unincorporated area of the county; in reality, due to the urban development policies of the jurisdictions in Napa County, housing countywide is primarily supplied within urban boundaries. The City has no way to control either where individuals live or where they choose to work; however, the City has always maintained a goal of achieving a jobs housing balance within its jurisdiction and considers this to be a suitable goal for all jurisdictions in the county unless a mutually agreeable program for shared housing is worked out between jurisdictions. The South County Working Group is pursuing opportunities for a solution to this question related to county jobs created in the airport industrial area.

**13.10E Commentator feels the DEIR alternatives analysis is inadequate for not considering excluding AW/AP lands or de-annexation of Stanly Ranch.**

**Response:** The Draft EIR evaluates Alternative A-1, Existing Policy, which is the equivalent of the CEQA required "no project alternative". This alternative excludes the area east of Big Ranch Road from the RUL and designates the Stanly Ranch as "Study Area", with no assigned development potential. This alternative is substantively the same as, and would have the same environmental impacts as, the alternative(s) suggested by the commentator.

**13.11E Commentator feels the DEIR fails to adequately describe the regional setting.**

**Response:** City disagrees with the commentator's assertion. Together, the Draft EIR, the Draft Policy Document, and the Draft Background Report contain extensive and detailed information on the regional setting. The key sections are identified in Table 1-1 on page 1-3 of the DEIR. The following summarizes where information on the regional setting can be found in each of the three documents.

**Draft EIR**

- Project Location pg. S-1
- Tables 1-1 pg. 1-3
- Project Location pg. 2-1
- Project Area pg. 2-1
- Figure 2-1 pg. 2-2
- Figure 2-2 pg. 2-3
- Various areas in Chapters 3-1 through 3-12 related to topical issues.



**Draft Policy Document**

- Regional Setting pg. 2
- History of Land Use Planning in Napa pg. 2 to 7
- Napa General Plan Context pg. 8 to 11
- Environmental Constraints pg. 11 to 12

**Draft Background Report**

- Regional Setting pg. 1-1
- History of Land Use Planning in Napa pg. 1-5 to 1-11
- Most Chapters of Draft Background Report contain information on the regional setting related to the topical issues (e.g. "Regional Context", Chapter 3 Transportation, pg. 3-1)

**13.12E Commentator feels the DEIR fails to adequately address regional and cumulative traffic impacts.**

**Response:** *See Response to Comments 8.1, 13.4 and 13.5.*

**13.13E Commentator cites the DEIR's use of incorrect traffic projections in two areas.**

**Response:** *See Response to Comment 13.4* with regard to the methods used to derive 2020 land use estimates. The traffic consultant has reviewed the 2020 land use file with respect to the South Napa Marketplace project and notes that the zone containing this project contains an increase of 540,000 square feet of general retail land use between the 1992 base year and the 2020 buildout year. There are small increases in other uses as well. This amount of land use exceeds the actual project as analyzed by Dowling Associates in a CMP conformity analysis dated January 19, 1993, meaning that there is room for additional growth in that zone. Likewise, the Lucky Superstore was analyzed in a letter dated February 23, 1994 by Dowling Associates to the City. That letter showed a proposed increase of 35,000 square feet of retail use. Comparing the 1992 and 2020 General Plan data used in support of the General Plan, the traffic consultant finds that the zone where the development is located contains an increase of 49,000 square feet of retail use, enough to accommodate the proposed development.

The data upon which this analysis is based have been available to all parties for a long time, contrary to what is implied in this comment. In fact, these questions were never raised with the consultant prior to their appearing in this letter; the data have remained in the consultant's hands, and it is not entirely clear how these conclusions could have been reached without inspection of the actual data upon which the analysis is based. The information presented demonstrates that the consultant has maintained consistency among the various projects noted in the comment.

**13.14E Commentator expresses concern that the DEIR does not adequately address the impacts of Stanly Ranch and Big Ranch Road on capacity of Napa Sanitation District to provide service to the Airport Industrial Area.**

**Response:** *See Standard Response Wastewater, Standard Response Stanly Ranch and Standard Response Big Ranch.*

**13.15E Commentator says DEIR needs to evaluate the feasibility of Phase II of the Sewage Treatment Master Plan.**

**Response:** *See Standard Response Wastewater.*

**13.16E Commentator feels discussion of proposed mitigation for wastewater treatment and disposal is inadequate.**



**Response:** *See Standard Response Wastewater.*

**13.17E Commentator feels DEIR analysis of cumulative impacts is inadequate.**

**Response:** *See Standard Response RUL, Standard Response Stanly Ranch and Response to Comment 13.6.*

**13.18E Commentator disagrees with conclusions in the DEIR that all impacts are reduced to a level of insignificance. Commentator specifically cites traffic impacts.**

**Response:** *See Response to Comment 13.5.* Note that SR29/Trancas will be at LOS B with the interchange. The project has received environmental clearance and \$27 million has been programmed for the project, \$5 million of which has been approved for the first phase of right-of-way acquisition and project design. The Sierra median closure at Highway 29 is funded in the Big Ranch Area Development fee.

**13.19E Commentator questions the conclusion that there will be no significant impact on wastewater even though no mitigation measures are identified.**

**Response:** *See Standard Response Wastewater.* The DEIR has been revised to conclude that wastewater impacts are less than significant after application of specific mitigation.

**13.20E Commentator says DEIR does not adequately address growth inducing impacts of development in the Stanly Ranch and Big Ranch Road areas.**

**Response:** *See Standard Response RUL and Standard Response Stanly Ranch*

**13.21E Commentator feels annexation of agricultural land contemplated by Draft General Plan conflicts with County General Plan and is therefore a significant environmental effect.**

**Response:** *See Standard Response RUL.*

**13.22E Commentator questions apparent shift in City policy concerning providing housing for workers in the southern county area.**

**Response:** *See Response to Comment 13.9E*

**13.23E Commentator suggests air quality analysis must be revised based on revised traffic analysis.**

**Response:** *See Response to Comment 12.5.* Based on evidence presented in other traffic related responses it is concluded that traffic has been properly analyzed, and that in adding the response to Comment 8.1, those concerns that were not included in the original Draft EIR have been adequately addressed in this document. There has been nothing uncovered by the comments that has required revision to the traffic analysis and conclusions and therefore there is no need to supplement the air quality analysis.

**13.24E Commentator feels DEIR does not adequately address Draft General Plan's conflict with the County's General Plan.**

**Response:** *See Standard Response RUL.*

**14. Sierra Club Napa County Group  
November 18, 1996**

This letter was superseded by the Sierra Club's December 2, 1996 (Communication #27)

**15. Napa County Local Agency Formation Commission  
November 18, 1996**

- 15.1E** Commentator feels that, with the exception of sections pertaining to Stanly Ranch, the DEIR is adequate:

**Response:** Comment noted: no response necessary.

- 15.2E** Commentator feels that the DEIR fails to adequately address impacts of the Stanly Ranch area and offers several observations concerning Stanly Ranch related to the legislative intent and purpose of LAFCO.

**Response:** *See Standard Response Stanly Ranch.*

**16. Chris Malan  
November 18, 1996**

- 16.1E** Commentator notes DEIR statement that the City's transportation system is built out to its maximum requirements in most locations and the Draft Policy Document's recognition that "the City must learn to do more with less" with respect to transportation planning.

**Response:** Comment noted; no response necessary.

- 16.2E** Commentator states that the DEIR does not consider the financial cost and environmental impacts of development of the Maxwell Bridge (aka Imola Bridge).

**Response:** *See Standard Response CEQA Application to General Plans as well as Implementation Program T-1.A on page 3-11 of the Policy Document.* Design details of an eventual bridge project will be subject to project level environmental review. The resulting design of the Flood Control project will also influence the eventual bridge design and may change the baseline environmental conditions in the area. The Natural Resource Policies of the General Plan that address river habitat and resource protection will also apply to consideration of a future bridge project. The Maxwell Bridge is on the list of projects to be funded by the Street Improvement Fee with \$ 1 million already encumbered by the current 5 year CIP

program. An ISTEA grant application has been submitted for \$ 8.7 million and additional STIP funding may be available depending on project priorities established by the CMA.

- 16.3E** Commentator acknowledges the Draft Policy Document's commitment to developing a viable funding source to implement proposed transportation improvements, but asserts that the DEIR does not sufficiently address several issues related to roadway development.

**Response:** Comment noted; no response necessary.

- 16.4G** Commentator supports the development of mass transportation, and offers several comments concerning its benefits.

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

## **17. Committee of Concerned Citizens November 18, 1996**

- 17.1E** Commentators feel that the DEIR does not adequately address visual and public safety impacts in the Stanly Lane area.

**Response:** *See Standard Stanly Ranch Response.*

- 17.2E** Commentators are concerned about future traffic associated with roadway improvements; they suggest that additional capacity may invite more traffic.

**Response:** The question of whether "relatively uncongested street" is what we wish to maintain is a policy question; the Draft Policy document attempts to retain this through its service level policy; to the extent that that policy is implemented and satisfied, the response to this question would appear to be "yes". The question as to whether widening of streets invites more traffic and subsequent development is one which is difficult to prove one way or another. Much depends on the size and location of the improvement. Without trying to be humorous, this is somewhat of a chicken and egg situation. Growth will usually not occur if there is no infrastructure to support it. On the other hand, growth can be planned in such a way and in such a location that growth and infrastructure are planned and programmed to appear jointly (if not simultaneously). The major projects proposed in the City of Napa General Plan have been identified in response to growth both within the City and in the entire Bay Area. While there may be growth-inducing elements to some of them, the consultant team believes that these are strictly secondary to the goal of supporting the growth that is contained within the land use element and other parts of the General Plan.

Response to Comment 27.26 provides additional information regarding the relationship of transportation facilities to land use.

## **18. Susan Levine-Roust November 18, 1996**

- 18.1E** Commentator asserts that the DEIR was not subjected to a "proper public forum for discussion."



**Response:** *See Introduction to Response to Comments.* The availability of the Draft General Plan and DEIR documents was noticed with a display ad in the Napa Register and those individuals who had requested written notice of General Plan proceedings were notified by mail. The required EIR 45 day circulation period of 10/4/96 through 11/18/96 was extended by the Planning Commission to 12/2/96 providing a total of 60 days for public review and comment. Although not required by law, the Planning Commission held two public hearings during the circulation period (10/17 and 10/24/97) to receive comments on the DEIR. The availability and status of General Plan documents has been noted at the top of every Planning Commission Agenda since October 1996. Recirculation of the DEIR with the Response to Comments will provide additional opportunity for public comment.

**18.2E Commentator feels that it would be premature to pass (certify) an EIR on a general plan that has not been passed (adopted).**

**Response:** *See Standard Response CEQA Application to General Plans.* The EIR will not be certified until public review of the Draft General Plan and the DEIR are concluded and the General Plan is ready for adoption. CEQA requires certification of an Environmental Document prior to a decision to approve a project or plan.

**19. Susan Rushing-Hart  
November 18, 1996**

**19.1E Commentator inquires about stormwater diversion in the North and North-Western areas of the city.**

**Response:** *See response to Comment 2.3.* The maximum potential development for the Linda Vista Planning Area is 8.8% and the Vintage Planning Area is 11%

**19.2E Commentator raises questions about the relationship between roadway improvements identified in the Big Ranch Road Specific Plan.**

**Response:** *See Standard Response Big Ranch.* Circulation and Land Use details adopted with the Big Ranch Specific Plan (BRSP) in October 1996 will replace the details shown for this area in the Draft General Plan. The information in Table 3.3-2 page 3.3-5 is based on the Draft General Plan information that was released for public review prior to adoption of the BRSP.

**19.3E Commentator is concerned about natural resources and habitat in and along the Salvador Channel, and suggests that the City explore the possibility of keeping an area of the city open for seasonal wetlands. See Big Ranch Specific Plan EIR – Mitigations already specified for Salvador Channel – already reviewed and confirmed by Fish and Game and Army Corps. Adopted Big Ranch Specific Plan has been incorporated into the Draft General Plan through an Addendum – subject to final inclusion by the city Council upon review and action on the General Plan documents.**

**Response:** *See Standard Response Big Ranch.* The City Council adopted the Big Ranch Specific Plan on October 22, 1996 (City Council Resolution 96-235). The mitigations from the Big Ranch SP EIR were incorporated as policies in the Specific Plan, including very detailed and lengthy mitigations related to the Salvador Channel that were reviewed and confirmed by Fish and Game and the Army Corps of Engineers.

These mitigations/policies (found on pages RC-18 through RC-23 of the Big Ranch Specific Plan) are at a much greater detail than would be found in a General Plan.

**19.4G Commentator inquires generally about the composition of the Citizen Advisory Committee and specifically whether any members of the CAC reside in the Big Ranch area.**

**Response:** Page 7 of the Draft Policy Document (under the heading "How This General Plan was Prepared") describes the planning process that started in 1991 with the appointment of a 19 member citizen's advisory committee (CAC). In order to provide a balance of citizen input, members of the CAC were selected to generally represent all areas of the City through appointment of representatives from the planning areas that are defined by the 1982 General Plan. Two members resided in the area north of Trancas and East of Highway 29; the Big Ranch Road Area is within the planning areas that these two members represented. Additional details regarding the CAC membership may be obtained from the City of Napa Planning Department.

**19.5G Commentator is concerned about how the policies and programs of the Draft Policy Document relate to the seven major objectives explained in pages 12 through 16.**

**Response:** These policy concerns can be presented to the City Council during hearings on the Draft General Plan

**19.6E Commentator would like to know if future development estimate for the Vintage Planning Area in Table 2-3 on page 2-14 of the DEIR includes the 843 units approved in the Big Ranch Specific Plan.**

**Response:** The future residential development projection for the Vintage Planning Area includes the development potential projected for the Big Ranch Area.

**19.7E Commentator would like to know when water and NSD issues were resolved and implemented.**

**Response:** *See Standard Response Water Supply and Standard Response Wastewater.* Because the commentator's question is extremely vague, a detailed response cannot be prepared.

**19.8E Commentator would like to know the location, amount, and percentage of total land within the RUL of retained grasslands.**

**Response:** A detailed inventory of grassland acreage and other habitat types was not conducted for the General Plan. The purpose of the referenced text on pages 3.7-2 to 3.7-3 of the DEIR is to generally describe where grasslands occur within the Napa region. The text further describes the types of areas where grassland remains within the RUL. The term "grassland" is not intended to imply "native grassland" when used in these descriptions. Both the DEIR and the Draft General Plan recognize that lands within the RUL are intended primarily for urban development and that retention of certain grass and other vegetative cover is important in preventing erosion and in preserving scenic qualities and habitat. Policies in the Land Use Element under Goal 9 and in the Natural Resource Element recognize the need to integrate future urban development with remaining sensitive habitats within the RUL. It should be noted that the fundamental objective of the City's General Plan is to confine urban development and avoid the need for significant expansion of the RUL that would result in impacts to significant grassland, riparian, woodland and other habitats in the un-incorporated County.

**19.9E Commentator would like to know why it is not possible to retain enough open space and habitat to sustain plants and animals.**

**Response:** As described on page 1 of the Draft Policy Document, the purpose and nature of the General Plan is to provide guidance for land use and development for all territory within the City's jurisdiction. The plan must be comprehensive in addressing all physical aspects of the community's development and state law requires a minimum of seven topics or elements of concern be addressed. These required elements include subjects that relate to the urban framework that supports the human population as well as the environmental setting and the need for integrating conservation goals with urban needs. Given the fundamental community objective to confine urban development within the RUL, it would be difficult to develop a balanced General Plan (consistent with state law) if it were to focus only on retention of open space and habitat at the expense of the other needs for maintaining a vital urban community.

- 19.10E Commentator requests that the existing conditions discussion of Section 3.9, Hydrology and Water Quality, of the DEIR address the floods of 1993 and 1995, and questions how development of additional land within the RUL will affect flooding issues.**

**Response:** *See Response to Comment 2.3.* The 1986 Flood is the Flood of Record with neither the 1993 or the 1995 flood events being as significant.

- 19.11E Commentator is concerned about the likelihood of flooding of the Salvador Channel, given new development in the North and Northwest area of the city.**

**Response:** *See Responses to Comments 2.3 and 19.1.*

- 19.12E Commentator questions the benefit of participation in the FEMA insurance program, and inquires about FEMA regulations concerning development in a floodplain or development that might cause flooding in other areas.**

**Response:** *See Response to Comment 2.3.* The benefit of participation in the FEMA Insurance Program is that affected properties are able to both secure flood insurance and obtain the lowest possible rates. Participation in the FEMA program necessitates floodplain regulation as described in the Background Report Chapter 8.

- 19.13E Commentator questions the credibility of DEIR findings concerning stormwater runoff (p. 3.9-3).**

**Response:** *See Response to Comment 2.3.*

- 19.14E Commentator would like to know how much land is slated for development in the North and Northwest areas, and how much new development will be drained by the Salvador Channel.**

**Response:** *See Response to Comments 2.3 and 19.1.*

- 19.15E Commentator would like to know what percentage of the Napa River drainage is being left open for seasonal wetlands, as well as what percentage of the 1.62 square miles of undeveloped land in the RUL is being left as open space or seasonal wetlands.**

**Response:** *See Standard Response Flood Control.* Approximately 4.5 square miles or 25% of the land contained within the RUL is included in the flood plain/floodway.

- 19.16E Commentator would like to know why the DEIR (pg.3.9-3) does not acknowledge the Salvador Channel as a natural drainageway.**

**Response:** The referenced text lists four natural waterways in the RUL as better known examples and uses terminology that would not exclude other natural waterways that exist. The purpose of this



paragraph in the DEIR is to demonstrate that there are natural drainages in the city and that Chapter 7 of the General Plan includes broad policies to address the protection and enhancement of these features. These policies would apply to all areas where natural drainageway environments exist within the RUL. With regard to the Salvador Channel, the recently adopted Big Ranch Specific Plan and EIR address very specific mitigation measures related to this drainage feature which have been reviewed and confirmed by the Army Corps of Engineers and the California Department of Fish and Game.

- 19.17E Commentator would like to know how the DEIR can conclude that VMT growth rate will be lower than the projected population growth rate.**

**Response:** The question relates to a quotation of the standard for significance as defined by the Bay Area 1994 Clean Air Plan. The Draft EIR does not claim to meet this standard; however, on page 3.10.3, the document clearly outlines its response to this standard, including the computations undertaken and the sources of the analysis.

- 19.18E Commentator questions the cited average vehicle speeds cited on page 3.11-2 for Soscol Avenue-Silverado Trail and Big Ranch Road-Trancas.**

**Response:** The referenced page shows the table of noise contours. An average speed was assigned for the purposes of projecting the potential noise contour given the amount of traffic projected for these streets. The table is not intended to demonstrate the maximum speed limit as this may change during the term of the Plan.

- 19.19E Commentator questions whether Sierra Avenue is no longer considered a collector, and, if not, would like to know how the reclassification will affect surrounding streets.**

**Response:** Sierra Avenue is currently listed in Table 3.11.2 of the Draft EIR as well as Figure 3-1 of the Policy Document as a collector street. The Policy Document will be revised as necessary to reflect changes to street designations to be consistent with the adopted Big Ranch Specific Plan.

- 19.20E Commentator does not understand how the DEIR identifies no significant unavoidable adverse impacts when the Big Ranch Specific Plan EIR noted several.**

**Response:** See *Standard Response Application of CEQA to General Plans and Standard Response Big Ranch*.

- 19.21E Commentator expresses concern about the loss of open space resources in the Napa Valley.**

**Response:** See *Response to Comments 19.8 and 19.9*. The commentator describes the primary concerns that have driven General Plan policy in both the City and County of Napa for over 20 years. Constraining urban development within the existing cities in the county will sacrifice some remnants of fragmented open space and habitat in these jurisdictions in order to achieve significant conservation of the unique and valuable resources that make Napa County world famous for its agriculture and scenic attributes.

- 19.22E Commentator is curious about the 6,000-person difference between the 1990 population number cited in Table 4-1 on page 4-3 of the DEIR and estimates published by ABAG.**

**Response:** The Association of Bay Area Governments (ABAG) prepares projections for growth in Bay Area communities every other year by consulting with cities and counties and then by making adjustments to the base data through an assessment of regional trends. The resulting “predictions” are not always comparable to the census. The ABAG figures for 1990 shown in Table 4-1 on page 4-3 of the DEIR show what ABAG had predicted for 1990. The purpose of showing historic projection figures is to demonstrate

the trends that future projections are based on. The commentator correctly observed that AGAB's projection to 1990 (which was probably made in the 1980's) was greater than the actual 1990 RUL population included in the City's population data on the table. It should be noted that the ABAG projections are for the total area within the City's RUL, including unincorporated land as well as the State Hospital; the City's projections to 2020 are based on this area as well; however, the census population is based only on population within the incorporated City Limits. The 1990 census counted 61,842 persons within the incorporated boundaries of the City.

**20. John Rutherford**  
**November 16, 1996**

- 20.1E** Commentator is heartened by the conservative nature of the DEIR, but is concerned about previously-disclosed impacts of a very large development project in the city.

**Response:** See Standard Response Stanly Ranch.

**21. North Bay Association of Realtors**  
**November 15, 1996**

- 21.1G** Commentators are concerned about the growth-slowing effect of the RUL, and encourages the addition of more MU-designated areas

**Response:** These policy concerns can be presented to the City Council during hearings on the Draft General Plan.

- 21.2G** Commentators support the addition of an economic element to the General Plan and recommend that land use projections be included in the new element.

**Response:** See response to Comment 1.1.

**22. Cathy Zeller, et. al.**  
**November 18, 1996**

- 22.1E** Commentators are opposed to the extension of Souza Lane east of Capitola Avenue, citing numerous arguments against the extension.

**Response:** During the review of a recent subdivision application in the area designated for the Souza Lane extension, the City Council directed staff to take the necessary steps to eliminate this road segment from the General Plan. A supplemental traffic analysis has been conducted by Dowling Associates (the City's General Plan traffic consultant) which concludes that the Souza Lane segment can be eliminated

provided that the Saratoga road connection is implemented. An addendum to the Draft Policy Document will be prepared pursuant to the City Council's direction on this matter.

**23. Dennis Scherizinger**  
**November 18, 1996**

- 23.1E** Commentator provides updated numbers concerning the potential yields of the City's water supply sources, arguing that these supplies are barely sufficient to address current demand, let alone demand generated by additional development.

**Response:** *See Standard Response Water Supply.*

**24. Friends of the Napa River**  
**December 2, 1996**

- 24.1G** Commentator welcomes the generally enlightened and sensitive approach to balancing growth concerns with protection of natural resources and quality of life reflected in the Draft General Plan.

**Response:** Comment noted; no response necessary.

- 24.2G** Commentator does not feel the Draft General Plan has given sufficient focus and attention to the Napa River, including failure to recognize the river within the seven project objectives.

**Response:** *See Standard Response Flood Control.* The objectives cited by the commentator are DEIR distillations of the objectives described in the Draft Policy Document, which do mention the river.

- 24.3E** Commentator feels that the Draft Plan contains too many vague and ambiguous policies, implementation programs, and mitigation measures, and that the DEIR's discussion of alternatives is confusing and incomplete.

**Response:** The City acknowledges the comments but disagrees with them. No response necessary.

- 24.4G** Commentator is concerned that the City Council and Planning Commission may override the General Plan and not implement its provisions.

**Response:** By law, the City Council and Planning Commission cannot take any action that is inconsistent with the General Plan or any specific plan but may amend either plan when they deem it to be in the public interest.

- 24.5G** Commentator recommends that the City create a separate element addressing the Napa River that consolidates all policies and programs associated with the river.

**Response:** *See Response to Comment 2.2G.*



- 24.6G** Commentator suggests preparing a specific plan that covers the urban reaches of the Napa River, specifically Planning Areas #8 and #9, and that the General Plan include a specific land use designation(s) for the river corridor.

**Response:** : *See Standard Response Flood Control and Response to Comment 2.1.* The City has recently become involved in the land-side planning related to the Flood Control Project.

- 24.7G** Commentator requests that the General Plan explain in detail and incorporate as policy the Flood Management Plan's concept of a multi-objective project that accomplishes both flood protection and river restoration.

**Response:** *See Standard Response Flood Control and Response to Comment 2.1.* Policies HS-3.5 through HS-3.9 and NR-1.1, NR-1.4, NR-1.5, NR-1.6, NR-1.8 apply. In addition, Programs NR-1.A through NR-1.D provide the means of implementation.

- 24.8G** Commentator requests that the General Plan more fully and clearly embrace the urban downtown riverfront as key to the revitalization of Downtown Napa. Commentator argues for the preparation of a specific plan and adoption of development and design guidelines for the river corridor.

**Response:** *See Response to Comments 24.6, 2.1 and Standard Response Flood Control.*

- 24.9G** Commentator suggests the General Plan include an implementation program to negotiate an agreement with Napa County to support the goals of the urban riverfront.

**Response:** *See Standard Response Flood Control.* It is assumed that the County's involvement in the flood control project implicitly binds them to any of the implementation details that are a result of an adopted program.

- 24.10E** Commentator requests that the Draft Plan and DEIR include more extensive discussions of aesthetic issues and impacts.

**Response:** The comment provides some interesting ideas; however, several alternatives were considered during the lengthy CAC process and the scenario that the Draft General plan is based on is that which the City Council confirmed in the Concept Report. If the Council wishes to consider any of the elements of the alternatives presented in the comment, they may do so and direct staff accordingly during the General Plan hearing process. With regard to Aesthetic consideration, several policies are proposed in the Land Use Element that require guidelines for residential, commercial and downtown development to achieve a more attractive and functional urban environment. As noted in the DEIR, these policies are considered as mitigation measures as well.

- 24.11E** Commentator requests that the Draft Plan and DEIR more thoroughly address transportation and parking issues, with an emphasis on multi-modal travel.

**Response:** Comment acknowledged; the City believes that the multi-modal policies incorporated into both the Land Use and Transportation Elements of the Policy document adequately address these issues in the context of this General Plan.

- 24.12G** Commentator suggests several additions to the Draft General Plan, including several maps

**Response:** Comment noted; no response necessary.

- 24.13G** Commentator suggests revision to Program LU-6A; implementation program regarding business

**incentive program and design guidelines; guidelines for downtown should address design alternatives that incorporate the Napa River as a natural resource/environmental/cultural focus.**

**Response:** The implementation program is written to reflect design alternatives that incorporate the Napa River as a commercial and recreational focus. The very fact that the Napa River is a natural resource and has environmental issues associated with development around it will be addressed within the above context. The downtown itself is viewed as the cultural hub of the community, the cultural role the River plays will be incorporated into the program as appropriate. It is the intent of the program to prepare a plan whose focus is to promote high quality public and private redevelopment and development in downtown, with the Napa River as a vital component of the plan, not the primary focus.

**24.14G Commentator suggests revision to Policy LU-9.2.**

**Response:** During the public hearings on the General Plan the City Council will review policies and determine if they adequately respond to the goals and objectives for the community. Any suggested revisions to policy text will be subject to City Council review and consideration at that time. *See Response to Comment 19.9* regarding the need for a balanced, comprehensive approach to policy development in the General Plan.

**24.15G Commentator suggests revision to Policy LU-9.3.**

**Response:** *See Response to Comment 24.14.*

**24.16G Commentator suggests revision to Policy LU-9.4.**

**Response:** *See Response to Comment 24.14.*

**24.17G Commentator suggests revision to Policy LU-9.5.**

**Response:** *See Response to Comment 24.14.*

**24.18E Commentator suggests adding another objective under Natural Resources that emphasizes maintenance of a "living river."**

**Response:** *See Standard Response Flood Control and Response to Comment 24.7.*

**24.19E Commentator suggests revision to Chapter 7, Natural Resources, introductory discussion of wetland habitat.**

**Response:** The text referenced in Chapter 7 is not in the form of policy but is descriptive in nature and is not intended to be directive. It acknowledges that there are opportunities for enhancement and protection of areas with wetlands while accommodating the remaining development envisioned by the Plan. Policies and programs that address this subject include NR-1.5, NR 1.6, NR-1.A, LU-9.1, LU-9.2, LU-9.4 and LU-9.5.

**24.20E Commentator suggests revision to Chapter 7, Natural Resources, introductory discussion of pollution.**

**Response:** *See Response to Comment 24.19* regarding the purpose of the text. Also see Policy NR-3.3, CS-11.5, CS-11.6, CS-11.7 and the Policies under Goals NR-4 and HS-7.

**24.21E Commentator suggests revision to Policy NR-1.3.**

**Response:** This policy is intended to provide support for any number of opportunities for enhancing natural habitats through additional native planting. This could occur during the review and “requirements” made on private development projects or as support of community projects or private organization programs for enhancing native habits.

**24.22E Commentator suggests revisions and additions to Policy NR-1.4 related to waterway improvement (flood control, dredging etc.) to minimize effects on riparian habitat.**

**Response:** Environmental review of these projects will tend to dictate what mitigations will be necessary or desired. The Draft General Plan contains policies for riparian enhancement throughout the RUL that would apply to waterway improvement projects. Any changes to Draft GP policies could be considered by the City Council when they hold hearings on the General Plan.

**24.23E Commentator suggests revision to Policy NR-1.6.**

**Response:** The provisions of the policy are consistent with acceptable mitigation practices. Project level CEQA review will provide guidance as to the appropriate mitigations. Project review will also be subject to Fish and Game, Army Corps and other agency referral as required to confirm whether off site mitigation is appropriate or feasible.

**24.24E Commentator suggests revision to Policy NR-1.10 regarding management practices for reducing the impact of pollution from urban activities through the construction of additional wetlands.**

**Response:** This is a subset of Policies CS-11.5 , CS-11.6. and CS-11.7 Public Works has no objection to the inclusion of constructed wetlands as one possible urban storm water BMP; however, the practicality of implementing this technique with smaller infill projects is limited.

**24.25G Commentator suggests revision to Policy NR-1.12 regarding provision for the use of permeable or semi-permeable materials for parking lots and other off-street paved areas.**

**Response:** The comment is fine in theory but falls short in practice. The trade off between some increased permeability versus maintainability with its associated liability issues does not justify a policy change. The commentator requests that the terminology in Policy NR-1.12 be changed to a more mandatory tone. The intent of the draft policy is to allow consideration of permeable surfaces as an alternative to paving on a project by project basis, provided maintenance and liability issues can be addressed to the City's satisfaction.

**24.26G Commentator suggests revisions to Chapter 7, Natural Resources, introductory discussions of habitat corridors and aquatic recreation.**

**Response:** See *Response to Comment 24.19* regarding the purpose of the referenced text. The first suggestion in the comment would add text that would imply that the only way to obtain open space habitat corridors is during the subdivision process. Given the fragmented nature of remaining land for subdivision in the RUL that is adjacent to habitat, the suggested text would reduce opportunities and preclude consideration of other alternatives for obtaining open space easements on private, developed lands. The second suggested text change offered by the commentator clarifies the intent of the discussion. A “no wake zone” is implemented with an enforceable 5 mph speed limit.

**24.27G Commentator feels that natural resource implementation programs scheduled for implementation in FY 2002 to 2004 (page 7-5) are too distant to provide intended benefits.**



**Response:** The timing of implementation programs is subject to 1) the City's financial and staff resources; and, 2) determination of priorities with other important General Plan policies and programs. These decisions, and any changes to implementation timing, are subject to consideration and prioritization by the City Council during the public hearings on the General Plan and subsequent budgets.

**24.28G Commentator suggest addition of paragraph to Chapter 7, Natural Resources, introductory discussion of groundwater (page 7-8).**

**Response:** The text of the Policy Document will be revised as suggested.

**24.29G Commentator suggests revision to Policy NR-4.3 regarding the monitoring of dredging effects in the Napa River.**

**Response:** Dredging is zero sum in terms of groundwater effects. Materials are neither added nor removed from the land mass supporting the aquifer.

**24.30G Commentator suggests new Policy NR-3.4 encouraging watershed management practices.**

**Response:** The comment is a subset of Policy NR-3.1. Language that carries a policy to an implementation level is subject to consideration by the City Council during hearings on the General Plan.

**24.31G Commentator suggests new Policy NR-4.7 concerning groundwater replenishment.**

**Response:** The policy recommendation can be presented to the City Council for consideration during hearings on the Draft General Plan.

**24.32E Commentator suggests new Policy NR-4.8 prohibiting undergrounding or covering of creeks.**

**Response:** This is inherent in the Natural Resource Conservation Policies but is more restrictive and begs the definition of creek, stream, etc. It should be recognized that it would be extremely difficult and impractical to address the health and safety issues related to storm drainage in an existing, built out, urban environment without using subsurface drainage structures.

**24.33E Commentator suggests new Policy NR-4.9 concerning management of pesticide- or fertilizer-tainted runoff.**

**Response:** This concern is addressed through Policies CS-11.5, CS-11.6, and CS-11.7.

**24.34G Commentator suggests new policy NR-4.10 supporting maintenance of a geomorphically stable river.**

**Response:** See *Response to Comment 24.18*. This is the subject of much scholarly debate. It would seem that the Napa River in the City of Napa is doing exactly what Mother Nature expects. The higher sloped upper regions of the river support higher velocities that erode the land form and transport the materials to the lower reaches of lesser slope where velocities decrease and deposition occurs. The occasional higher velocities encountered during flood events in turn carry the natural depositions seaward allowing the cycle to be repeated.

**24.35G Commentator suggests new policy CS-11.10 discouraging use of creeks to carry stormwater runoff.**

**Response:** The idea that "no creek should be required to carry more runoff than predevelopment" is relative. If the requirement were stated in terms of the frequency of return of a storm event it becomes quantifiable and may be desirable from a floodplain management standpoint.

**24.36G Commentator requests revision to flood control discussion on page 16.**

**Response:** *See Standard Response Flood Control.*

**24.37G Commentator suggests supplemental text for discussion of flooding in Chapter 8 (page 8-9).**

**Response:** The thrust of the suggested text is floodplain management that is already contained in Policies HS-3.3 and HS-3.4 and the City's Floodplain Management Regulations.

**24.38G Commentator requests that the policies under Goal HS-3 (flooding) be reevaluated to correct inconsistencies.**

**Response:** The inconsistencies are the reader's perception. The Floodplain Management Regulations are in fact a balance between unlimited development and a development prohibition. The Floodplain Management Regulations attempt to strike a balance between the Health and Safety responsibilities of the City and private property rights.

**24.39G Commentator suggests revision to Policy HS-3.2 regarding management of floodplain regulations.**

**Response:** The Floodplain Management Regulations appropriately deal with the suggested revision.

**24.40G Commentator suggests revision to Policy HS-3.6 regarding City support of programs and methods to reduce the flooding of the Napa River and tributaries.**

**Response:** The comment is editorial and repetitive of other policies and regulations. No response necessary.

**24.41G Commentator suggests new policy HS-3.10 concerning flood control channels.**

**Response:** As pointed out on Page 4-14 of the Draft Policy Document, the City has no jurisdiction in most cases, but does work in cooperation with responsible agencies to achieve the suggested result.

**24.42G Commentator suggests new policy HS-3.11 committing the City to assist homeowners and businesses in the floodplain with floodproofing.**

**Response:** Draft Policy HS-3.9b is intended to address this issue.

**24.43G Commentator suggests new policy HS-3.12 committing the City to assist property owners to locate outside of the floodway and floodplain.**

**Response:** This is inherent in Policies HS-3.1 and HS-3.2.

**24.44G Commentator suggests new policy HS-3.13 prohibiting property owners in the floodplain of the Napa River or its tributaries to add fill to their property.**

**Response:** This concept is also inherent in Policies HS-3.1 and HS-3.2. Fill within the floodplain and floodway are regulated by City of Napa Code Chapter 17.62.

**24.45G Commentator provides guidelines for urban riverfront, as referenced in comment 24.8.**

**Response:** The City of Napa has received the Friends of the Napa River's "Interim Guidelines for the City

of Napa's Urban Riverfront.." The City will provide copies of these guidelines to those working on the development of design guidelines for the City.

## **25. Friends of the Napa River**

**December 2, 1996**

### **25.1E Commentator suggests revision to economic development discussion on page 2-10 of the DEIR.**

**Response:** The text at the bottom of page 2-10 in the DEIR has inadvertently been omitted. The sentence needs to be completed by adding: "*....Food and the Arts, and promotion of the Downtown as a 24 hour destination, serving as a key element of the City's tourist economy as well as the City's regional/local retail and administrative center.*" The text offered by the commentator focuses on the Urban Riverfront; the purpose of the DEIR paragraph is to summarize the economic development trends anticipated by the Draft General Plan.

### **25.2E Commentator requests that the DEIR address the impacts of flood control on growth and development more specifically and carefully, particularly the growth-inducing effects of flood control improvements.**

**Response:** See Standard Response Flood Control and Response to Comment 24.18. Implementation of the flood control project would not extend the city's boundary or expand urban services into new undeveloped areas; but, instead would enable development, and in some cases redevelopment, of land in the urban core that has been historically impacted by the threat of flooding. These areas have always been assigned a land use designation and development has been allowed pursuant to the flood plain regulations and FEMA requirements. The Draft General Plan continues to assign land use designations to this area, mostly the MU-Mixed Use designation, and continues the policy of applying flood plain and FEMA requirements to development. The ultimate development potential of the MU designation was considered in the total development potential for the draft General Plan; however, as with the current General Plan development scenario, development is not likely to achieve the maximum potential as long as flood impacts exist. As stated in the General Plan DEIR, the fundamental City policy of confining development within a defensible RUL line addresses the potential for growth inducement by efficiently utilizing the vacant infill parcels within the City, including the underdeveloped areas that may be enhanced for development by a flood control project.

## **26. Moira Johnston Block**

**December 2, 1996**

### **26.1E Commentator strongly opposes development in the 13 acres west of Foster Road, stating that the potential visual impact associated with such development has not been mitigated.**

**Response:** See Standard Response RUL and Response to Comments 19.9 and 19.21.



## **27. Sierra Club Napa County Group December 2, 1996**

- 27.1E** Commentator feels that the DEIR is premature because the Draft General Plan contains too many outstanding issues.

**Response:** The City disagrees with the commentator's assertion. Updating a general plan is a process designed specifically to identify and address major development and environmental issues, and the EIR is an important tool in exploring and helping resolve these issues. Section 15123 of the State CEQA Guidelines specifically recognizes the evolutionary nature of the decision making process and the role of the EIR by requiring that the EIR identify: "Areas of controversy known to the lead agency, including issues raised by agencies and the public" ; and, "Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects". The comment and response process helps to explore issues. All of this information is eventually presented to the City Council for final consideration during the public hearings on the General Plan Documents. Also see Response to Comment 18.2.

- 27.2E** Commentator feels that many of the policies cited in the DEIR as mitigation are not specific enough.

**Response:** *See Standard Response CEQA Application to General Plans.* The City disagrees with the commentator's assertion. At the general plan level, policies such as LU-3.2 and LU-9.2 are useful and adequate mitigation measures. Even without specific implementation programs, these policies must be implemented through zoning, subdivision approvals, public works decisions, and similar actions which must by state law be consistent with the General Plan.

- 27.3E** Commentator feels that the DEIR's findings of significance related to the Stanly Ranch project are flawed.

**Response:** *See Standard Response Stanly Ranch.*

- 27.4E** Commentator takes issue with the DEIR's finding of the Draft Policy Document's consistency with the Airport Land Use Compatibility Plan (ALUCP).

**Response:** Pages 8-33 through 8-36 of the Background Report provide baseline information regarding the details and applicability of the Airport Land Use Compatibility Plan (ALUCP) to development in the City. Discussion and policies related to future applicability of these regulations are included in pages 8-18 to 8-22 of the Policy Document. The combined information in both documents provides adequate support for the impact conclusions presented in the DEIR. A complete set of draft EIR and General Plan documents was sent to the Airport Land Use Commission for comment at the beginning of the circulation period. The referenced text concerning a provision for a local jurisdiction to overrule the ALUC's determination is taken directly from the ALUCP and is a procedure provided by state law.

- 27.5E** Commentator takes issue with the DEIR's finding that conversion of agricultural land in Stanly Ranch is insignificant impact.

**Response:** *See Standard Response Stanly Ranch.*

- 27.6E** Commentator feels that the DEIR and Draft Policy Document conflict with one another concerning statements about environmentally sensitive areas.

**Response:** The first DEIR text that is cited from Section 3.2 is descriptive narrative, not prescriptive policy. The reference to usable acreage not including environmentally sensitive areas is describing how the capacity calculation for vacant land was conducted. It refers to the site specific capacity assessment based on environmental constraints as described on pages C-4 and C-5 in Appendix C of the Policy Document. The second referenced text from the Draft General Plan Policy document page 1-1 is an introductory description of the Plan concept that recognizes that by containing growth in the RUL on infill property, development will, in some cases, be on sites that are constrained from maximum development by natural features and steep terrain. The Draft General Plan Land Use Element, Natural Resource Element and Health and Safety Element contain numerous policies that address the issue of integrating development with resource protection goals.

- 27.7E Commentator feels that the DEIR does not adequately address land use impacts within the RUL or expansion of the RUL, particularly as they relate to the Big Ranch, Stanly Ranch, and Foster Road areas.**

**Response:** *See Standard Response RUL and Standard Response Stanly Ranch.* The policy recommendation concerning specific plans for Big Ranch Trancas and Foster Road can be presented to the City Council during hearings on the Draft General Plan.

- 27.8E Commentator argues that the analysis of ag land conversion impacts should be absolute, not relative to existing plans and regulations (i.e., general plan and zoning).**

**Response:** Comment acknowledged; the DEIR text has been revised in response to this comment.

- 27.9E Commentator feels that the DEIR does not adequately address the effects of expanding the RUL to encompass the Napa State Hospital. The commentator takes particular issue with the DEIR's argument that the Hospital grounds are already urbanized.**

**Response:** *See Standard Response RUL.* The Draft General Plan designates the entire State Hospital site as Public Serving (PS) and ascribes no new development potential to the area. Any future private development on the State Hospital property would require a general plan amendment, rezoning, and environmental review.

- 27.10E Commentator does not feel that the DEIR adequately addresses the effects of expanding the RUL to include the Foster Road area.**

**Response:** *See Standard Response RUL.* The Foster Road area is surrounded on three sides by incorporated land and services are available as with the adjacent city properties. Safety services are available as described under Response to Comment 27.32.

- 27.11E Commentator is concerned that the proposed RUL expansions are inconsistent with the expansion criteria set out in Policy A-2.1 of the Draft Policy Document.**

**Response:** *See Standard Response RUL*

- 27.12E Commentator feels that the discussion of growth management in the DEIR is inconsistent with the policy commitments of the Draft Policy Document, particularly as concern the RUL and growth management.**

**Response:** *See Standard Response RUL.* As described in the Standard Response, there are currently no specific policies to guide the consideration of RUL expansion requests. The policies in the

Administration Chapter provide a clear set of criteria for RUL amendment requests, and also impose the requirements of Measure J, which currently only applies to the County General Plan.

With regard to growth management; In addition to the policies to contain growth within the RUL, the policies listed on page 1-11 through 1-12 of the Draft Policy Document carry forward the growth monitoring program that has been in effect since adoption of the 1982 General Plan. The city's location on the fringe of the Bay Area along with the combination of policies that affect the amount and rate of growth in Napa have proven to be effective since adoption of the 1982 plan as demonstrated by the average 1.3 percent growth rate that was experienced between 1980 and 1990, a period of favorable economic conditions when annual growth rates experienced by other Bay Area communities were as much as 4 to 5 percent (Growth Management discussion, pg 1-11 of Policy Document). Policy LU-3.7 and Implementation Programs LU-3.B and LU-3.C carry forward the growth monitoring practices that the City has engaged in over the last 15 years. Monitoring includes monthly review of building permit activity and participation in the filing of an annual report with the State Department of Finance which summarizes annual development activity. In the past, development rates viewed over a 4 to 5 year increment have been consistent with the uniform rate of development anticipated for the planning period; in fact, for the most part, the rate has been below the straight line average anticipated by the 1982 Plan. The 2020 plan is based on a straight line growth rate projection of slightly over 1 percent. If this method of monitoring shows a peak in development which is continually above the projected development rate, staff will initiate formal reports to the City Council and engage in discussion of more aggressive growth management possibilities in order to ensure that capacity in the RUL is not outpaced by development during the planning period. This existing process is supported by Policy LU-3.7 in the Draft Policy Document.

**27.13G Commentator requests deletion of Policy A-2.1**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

**27.14G Commentator requests abandonment of RUL expansions encompassing the State Hospital and the area west of Foster Road.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

**27.15G Commentator suggests a new policy establishing a Resource Area (RA) designation to be applied to seriously constrained lands.**

**Response:** The PS designation is intended to apply to such areas. Resource protection policies are intended to apply to sensitive areas regardless of their land use designation. The City Council could consider a refinement of the PS land use designation during public hearings on the draft General Plan.

**27.16G Commentator suggests a new implementation program that calls for designation of several areas in the Planning Area as Resource Area (RA).**

**Response:** *See Response to Comment 27.15.*

**27.17G Commentator suggests a new policy that would establish, in cooperation with the Napa County Land Trust, a permanent greenbelt with linkages to trails and wildlife corridors.**

**Response:** The discussion on page 1-21 of the Draft Policy Document addresses the City's desire to maintain city centered urban growth and includes reference to encouraging the purchase of open space or



development rights to protect the greenbelt and RUL policies. The potential for future implementation will be based on fiscal limitations, and will not be limited by General Plan policy. An Addendum to the Draft Policy Document has been prepared that carries forward the greenbelt designation for county lands surrounding the city. This designation implies only a policy intent since these lands fall under the County's jurisdiction. The additional details outlined in the comment would be subject to the consideration of both the City Council and the Board of Supervisors and would not be appropriate to incorporate into the City's General Plan unless there is mutual agreement between the two jurisdictions.

**27.18G Commentator suggests a new implementation program to establish an open space/greenbelt buffer zoning classification to be applied to the edge of the city.**

**Response:** See Response to Comment 27.17. Also refer to Addendum # 2, which revises the Draft Policy Document to include the continuation of the Greenbelt designation of properties outside the RUL.

**27.19G Commentator suggests revisions to Implementation Program LU-6.A. (Business incentive program and design guidelines to promote high quality development downtown)**

**Response:** See Response to Comment 24.13.

**27.20G Commentator suggests revisions to Policy LU-9.2.**

**Response:** The suggested modification to LU-9.2 which would require a 1/4 mile buffer between development and natural areas would severely limit the modest potential for infill development on remaining lands within the RUL. The infill development strategy is intended to provide for growth without the need to significantly expand the RUL. The policies under Goal LU-9 and the resource protection policies in the Natural Resource Element reflect the protection practices that are effective given the urban influences that already exist in the RUL. These measures are also acceptable to the resource agencies that have jurisdiction and regulatory authority over these areas. If the limited remaining infill development opportunities within the RUL are further restrained, then the pressure to significantly expand the RUL will come sooner than the year 2020.

**27.21E Commentator takes issue with the DEIR's assumptions that the roadway improvements identified in the DEIR will be in place to mitigate traffic impacts.**

**Response:** See Response to Comment 13.5. Note that the roadway improvement projects listed as mitigations in the DEIR are extracted from the Policy Document Table 3-1 on page 3-4 and are also addressed in Policies T-1.9, T-1.A, T-1.D and supported by other policies in the Transportation Element.

**27.22E Commentator takes issue with DEIR's approach to determining the significance of traffic impacts.**

**Response:** See Response To Comment 10.10. With regard to the use of service levels as an adequate standard against which to measure impacts, it is the traffic consultant's understanding that an impact is best measured against a standard. Potential impacts are compared to standards of community acceptability. When those standards are exceeded, then an impact is defined. Service Level standards are the City of Napa's standard for measuring the quality of traffic service, and the EIR properly compares buildout traffic conditions to the standards set in the DGP. There are no "standards" for traffic volumes, in this General Plan or in any General Plan of which the authors are familiar. The volumes are used as input to the Service Level computation, and in that way, become directly involved with application of the standard. Traffic volume estimates have been prepared by the consultant and are available for inspection.

In paragraph 2 of this comment, the commentator states that the DEIR "attempts to explain away the impact by stating that it would simply be too expensive to mitigate." It is unclear how the commentators

arrived at that statement since no citation is provided. *See Response to Comment 13.5* regarding potentially significant impacts resulting from uncertainty of future improvement funding.

- 27.23E** Commentator feels that the DEIR does not disclose the impacts of development (extensions, widenings) of the roadways cited as mitigation to traffic impacts. The commentator further takes issue with the DEIR assumption that the City can build itself out of traffic problems caused by development.

**Response:** *See Standard Response CEQA Application to General Plans and Response to Comment 16.2.* Regarding the feasibility of project (i.e. mitigation) funding, see Response to Comment 13.5. The last paragraph of the comment is the commentator's opinion; no response necessary.

- 27.24G** Commentator concludes that the City is not serious about promoting bicycle travel because the Draft Policy Document does not include an implementation program identifying funding responsibility.

**Response:** *See Response to Comment 27.2.* As described in the Introduction to the Policy Document (pages 16 & 17), the lack of a corresponding specified implementation program does not negate the City's commitment as stated in Policy. Implementation programs are indicated when budget and staff are available to pursue the specifics of the program based on the evident priorities of the community. Identification and prioritization of General Plan programs will be subject to the City Council's consideration during the General Plan hearings. The question raised by the commentator can be presented at that time.

- 27.25E** Commentator takes issue with the DEIR's assertion that the "transportation system is well developed . . . "(page 3.3-1).

**Response:** Comment noted; no response necessary.

- 27.26E** Commentator feels that the DEIR ignores the impacts on neighborhood character caused by transportation improvements identified in the Draft Policy Document.

**Response:** *See Standard Response CEQA Applications to General Plans.* Projects outlined in the Transportation Element, including some road widening, outlined in the General Plan, will primarily take place on major roadways in the City and not on local streets in residential neighborhoods. The introductory discussion in the Transportation Element of the Draft General Plan Policy clearly sets the tone for transportation planning to respect neighborhood character. The Element recognizes the environmental and fiscal impacts of focusing planning policy toward the needs of the automobile and states on pg. 3-1 that:

*"While the automobile is expected to continue to be a primary mode of transportation, continued over dependence on the personal automobile has high environmental and monetary costs. As streets are widened or built, they are quickly filled by vehicles, creating a need for additional widening. Numerous multi-lane, congested streets diminish the community's surrounding noise levels and degrades air quality. ....*

*If there is a consistent theme for Napa's transportation planning as it approaches a new century, it is that the City must learn to do more with less. Napa's road system is largely built and is unlikely to change much over the next 25 years. There is less money for improvements, not only for roads but for transit and other modes. There is also a desire to somehow reduce the impacts of traffic on neighborhoods."*



Policies such as lowering the LOS Standard to D and promoting alternative transportation choices have been included to reduce the level of road improvements needed to satisfy planned growth. In essence, the citizens will need to experience increased “inconvenience” in using the automobile and take advantage of alternative transportation in order to preserve other more important aspects of Napa’s urban environment.

**27.27E Commentator takes issue with DEIR's discussion of public transportation impacts, particularly with respect to the City's bus system.**

**Response:** The commentator concludes that “the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances.” This is a statement of opinion; the authors of the DEIR note that in no case is the plan constructed on the assumption that the public transportation system should serve as mitigation. Public transportation is a stand-alone service intended for a variety of purposes; however, mitigating the impacts of the General Plan is not one of them, and the DGP does not make this claim.

The Draft General Plan Background Report provides a brief summary of public transit service. The City of Napa has adopted a policy for public transportation which emphasizes broad coverage and basic service standards for the transit system. The Short Range Transit plan (SRTP), a federally-mandated document updated and adopted by the City annually, sets a policy goal of providing a bus route within 1/4 mile of 85% of dwelling units within the City, with headways (time between buses) to be set minimally at one hour. Based upon demand, these headways are decreased when ridership reaches 35 passengers per revenue hour of service. Three routes have half-hour service. Two routes, to the northern areas of the City where residents are more affluent and less transit dependent, have hourly headways. These two routes do not yet produce 35 passengers per revenue hour of service, the benchmark for decreasing headways.

In addition, the focal point of the system, by policy, is Downtown Napa. Thus, all routes begin and end in Downtown, with timed transfers between routes. For a small urbanized system, the VINE has very good productivity, with 26 passengers per revenue hour of service carried systemwide.

The Draft General Plan contains a policy framework for expansion, improvement, coordination, and modifications to the transit system, as well as providing for a more active role by developer in contributing to transit improvements, as funding resources, demand, and population grow. Further, the role of Napa Valley Transit’s growth is highly dependent upon other jurisdictions in the County that fund NVT and which are parties to the policy direction set for NVT. These affect not only Napa, but all of the other cities and a large portion of the unincorporated areas of the county, beyond the jurisdiction of this Draft General Plan.

**27.28E Commentator suggests that the DEIR cite Policy T-10.1 as potential mitigation for impacts related to increased resident and tourist traffic into and out of the Napa Valley.**

**Response:** Comment noted; no response necessary.

**27.29E Commentator suggests a new policy that would require all projects that might impact river and creek habitat to avoid or fully mitigate potential impacts.**

**Response:** See *Standard Response CEQA Application to General Plans*. This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. Additional projects that could impact the river or creek habitat would be subject to CEQA review.



**27.30G Commentator suggests a new policy that would call for the City to create a tourist shuttle system.**

**Response:** *See Response to Comment 27.24.* A specific commitment to the funding and development of a City operated model shuttle system as an implementation program in the General Plan will be subject to consideration by the City Council during public hearings on the Plan. The Draft General Plan provides sufficient policies to support the concept if the opportunity is available in the future.

**27.31G Commentator suggests a new implementation program calling for the City to cooperate with the Congestion Management Agency to promote a regional shuttle system with staging areas on the south edge of the city.**

**Response:** *See Response to Comment 27.30.* The City, as a member of the CMA, will cooperate in supporting the implementation of regional projects that are included in the CMP. At present, the CMA is considering a variety of project combinations to improve transportation in the County, including the combination of highway and enhanced transit projects. Draft General Plan policies do not preclude the City's ability to support the suggested program if it should become a CMA priority and receive funding.

**27.32E Commentator questions DEIR conclusion that expansion of the RUL will not increase police and fire response times. Commentator also questions the DEIR's assumption that the Napa State Hospital will continued to be served by State Police.**

**Response:** *See Standard Response Stanly Ranch and Standard Response RUL.* In addition, the following information is offered:

**Fire Department**

Fire Department response times will not increase since all of the proposed RUL expansions are adjacent to of the city limits and within the same distance range as other incorporated land. If the Stanly Ranch area is developed, its impacts on the delivery of fire service will be addressed in the specific plan and EIR prepared for a proposal to develop the area. Preliminary discussions have always included a public safety fee to pay for services.

Currently, all new development pays a Fire and Paramedic Development Fee to provide for constructing and equipping an additional fire station. This fee was developed to offset the impact of new development on existing resources.

**Police Department**

The DEIR , acknowledges that development accommodated by the Draft General Plan would increase the demand for police services but would not be expected to adversely affect response times (pg. 3.4-5 #1). It goes on to state that the Draft General Plan Policy Document contains policy recommendations to ensure that additional police staffing be added commensurate with whatever growth does occur.

A police department's response time is determined by four factors:

1. The number of officers deployed on the street at a given time.
2. The number of calls for service pending at that same time.
3. The priority (urgency) of the pending calls.
4. The distance from whence they are responding.

Unlike a fire department, police officers do not respond from a fixed station but rather respond from wherever they happen to be when the call is dispatched. Wherever they happen to be is determined, for the most part, randomly. Therefore, development at the edge of the RUL does not necessarily mean increased response times if sufficient officers are deployed to handle the calls for service.

In reference to the comment that “The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City...”, it should be noted that the City of Napa Police Chief is a member of the Napa State Hospital Task Force which meets regularly with NSH staff. At the present time, there are no plans to sell any portion of NSH for private development. In fact, the Department of Mental Health is proposing an expanded use of existing facilities and a corresponding increase in the Hospital Police force, which would make them the largest law enforcement agency in the county. It is the intent of the Director and the Hospital Police Chief to increase the scope of responsibilities for Hospital Police. However, the City has no control over what future governors, Department of Mental Health directors, or hospital administrators may do in the future.

- 27.33E Commentator feels that development in the Foster Road RUL expansion area will be subject to increased fire hazard, which could adversely affect fire protection services.**

**Response:** The City will not be faced with any significant difficulties in providing water to the area of RUL expansion west of Foster Road. The surrounding area is currently served by City water and while there are areas of increased elevation, water systems can easily be designed to serve these areas with adequate water pressure for both fire and domestic purposes. Water systems improvements for this area may include privately operated pumps and tanks to serve the area with water.

- 27.34E Commentator feels that the DEIR analysis of water supply impacts does not support its conclusions.**

**Response:** *See Standard Response Water Supply.*

- 27.35E Commentator feels that the DEIR's analysis of wastewater treatment, storage, and disposal should address the impacts of increased wastewater treatment.**

**Response:** *See Standard Response Wastewater.*

- 27.36E Commentator agrees with DEIR's conclusion that the proposed trail system could cause impacts on sensitive biological resources, and suggests other potential impacts that may result from trail construction.**

**Response:** The same policies related to the impacts of development projects would apply to the City's trail projects and serve as mitigation for General Plan purposes. As with other development envisioned by the General Plan, project level environmental review will evaluate the specific impacts of trail development on a particular location and mitigate accordingly.

- 27.37E Commentator feels that the DEIR's analysis of visual impacts is inadequate, particularly with respect to the southern gateways and hillside development in the RUL expansion area west of Foster Road**

**Response:** *See Standard Response to Comment RUL and Response to Comments 26.1, 19.9 and 19.21.*

- 27.38G Commentator requests relocation of visual gateways depicted in Figure 1-3 of the Draft Policy Document.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

- 27.39G Commentator suggests revision of Policy LU-1.5 to require that visual gateways integrate natural features.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

**27.40G Commentator feels that the DEIR's air quality analysis does not sufficiently address current air quality conditions, potential impacts, or mitigation policies.**

**Response:** The DEIR and General Plan documents' air quality information and analysis is based on the most current information available at the time of preparation using the BAAQMD data. The significance criteria is based on the recently adopted *BAAQMD CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plan* (April 1996). Air quality changes anticipated by the limited development in the City projected by the General Plan were not found to be significant over the 25 year term using these criteria. All of the air quality policies have been consolidated in Appendix E of the Policy Document and it is believed that the cumulative long term effect of implementing these policies on a project level basis will mitigate any potential impacts that may result from the limited growth anticipated by the Plan.

**27.41E Commentator does not feel that the DEIR's assessment of biological resources is sufficient. Specifically, the commentator does not believe the protections that the Draft Policy Document affords salt marshes are adequate mitigation against potential impacts.**

**Response:** Page 7-6 of the Background Report and page 3.7-2 of the DEIR describe the locations of salt marsh in the Napa region and contain text explaining that most of the significant, true saltmarsh areas of the Napa River occur south of the horseshoe bend, outside of the City limits. A portion of the extensive Napa Marsh occurs along the Stanly Ranch and is designated PS by the draft General Plan. As noted in Response to Comments 27.15 and 27.16, further refinement of this designation would be subject to City Council consideration. Also see Standard Response to Comment Stanly Ranch for details on how Specific Plan and related EIR will further address protection of these jurisdictional wetlands. Areas of the Napa River subject to tidal influence (below Lincoln Avenue) also provide a brackish habitat. Resource protection policies related to riparian habitat and water quality address potential impacts. Impact analysis item 2 on page 3.7-8 of the DEIR discloses potential impacts and identifies policies that provide adequate mitigation on a general plan level based on the significance criteria outlined on page 3.7-7. It should be noted that salt marsh areas are also under the jurisdiction of the U.S. Army Corps of Engineers and that projects which may impact wetlands will not only be subject to the requirements of CEQA but are subject to further scrutiny through the Corps permit process.

**27.42G Commentator suggests a new policy to reestablish, improve, and restore wildlife corridors.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

**27.43G Commentator suggest a new implementation program that calls for the City to establish a riparian setback ordinance establish 100-foot buffers.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan.

**27.44G Commentator suggest a new implementation program that calls for the City to develop a wildlife corridor overlay district.**



**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. Also see *Response to Comment 19.9* regarding the need for a balanced approach to development/resource preservation within the RUL.

**27.45G Commentator suggests a new policy for protection of existing wetlands and re-establishment or restoration of lost wetlands.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. The suggested policy describes the criteria used for evaluating wetland impacts in environmental documents and the limitations already imposed by the Army Corps of Engineers pursuant to their jurisdictional authority over wetlands.

**27.46G Commentator suggests a new policy calling for new residential development to enhance, restore, and expand riparian and wetland areas.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. It appears that the policies under Goal LU-9 along with the Natural Resource Policies that address integrating protection measures into new development already address this issue.

**27.47G Commentator suggests a new policy calling for new development on the fringe of the city to pay the full marginal cost of the development.**

**Response:** This policy recommendation can be presented to the City Council during hearings on the Draft General Plan. It should be noted that the majority of new development costs have traditionally been borne by developers due the City's fee structure. The Council could consider adjustments to fee requirements during their regular review of City Fees.

**27.48G Commentator suggests revision of Policy LU-6.4 to require riverfront development to consider natural resources and flood protection in its design.**

**Response:** The Draft General Plan provides policies to support river enhancement in the downtown while addressing the urban relationship with restored nature. With regard to the integration of these policies with a future flood control project, see *Standard Response Flood Control and Responses to Comments 2.1, 2.2 and Response to Comment Letter #24*.

**27.49G Commentator suggests revision of Policy LU-9.3 to require maintenance of wildlife corridors and prohibit fragmentation of large plant communities.**

**Response:** See *Response to Comments 2.7 and 19.9*.

**27.50G Commentator suggests revision of Policy LU-9.4 to protect environmentally sensitive areas by clustering nearby development proposals to avoid these areas.**

**Response:** The suggested revisions preclude any opportunity to explore alternative mitigations that may be available based on detailed project level environmental review. Suggested changes to policy text will be subject to City Council consideration during General Plan public hearings.

**27.51G Commentator suggests revision of Policy LU-9.5 to change "may" to "shall".**

**Response:** See *Response to Comment 27.50.G*.

**27.52E Commentator is concerned that many good policies in the Draft Policy Document do not have**

specific implementation programs to ensure their effectiveness as mitigations.

**Response:** The City disagrees with the commentators assertion that only implementation measures can serve as mitigations measures. In fact, many policies are self implementing and do not require a companion mitigation measure.

- 27.53E Commentator suggests modifying Policy NR-1.3 to "require" planting of native species in natural habitats.**

**Response:** *See Response to Comment 24.21.*

- 27.54E Commentator suggests revising Policy NR-1.4 to change 100 feet to ¼ mile from waterways for review of projects to ensure that they protect and minimize effects on the riparian and aquatic habitats.**

**Response:** Given the extent and intensity of urban development that exists within the RUL, riparian and aquatic habitats associated with the waterway are unlikely to exist in the expanded area. The analysis of hydrologic and water quality impacts related to development that might occur as a result of the Plan is on page 3.9-2 through 3.9-4 of the DEIR. Policies referenced in this analysis serve as adequate mitigation at a General Plan level and address the concerns raised in this comment because they apply to all development.

- 27.55G Commentator suggests revising Policy NR-1.6 to remove "Whenever possible" and replace it with language suggesting a more definitive commitment.**

**Response:** *See Response to Comment 24.14* regarding revisions to include more restrictive policy language.

- 27.56G Commentator suggests revising Policy NR-1.7 to remove "Endeavor to".**

**Response:** *See Response to Comment 24.14* regarding revisions to include more restrictive policy language.

- 27.57E Commentator is concerned that the DEIR does not adequately address seismic hazards in the Stanly Ranch area.**

**Response:** *See Standard Response Stanly Ranch* regarding environmental review at the Specific Plan stage the detailed evaluation of the distribution of land uses with the Specific Plan. The General Plan DEIR significance criteria for determining impact does not imply that the prohibition of development in these areas is the only available mitigation.

- 27.58E Commentator is concerned that areas with potential liquefaction hazards as designated for development, and that the DEIR does not recognize this potential problem.**

**Response:** *See Response to Comment 27.57* regarding DEIR significance criteria. Page 3.8-2 of the DEIR outlines mitigations that, when implemented with new development, would reduce the potential impact to a less than significant level.

- 27.59E Commentator requests that the DEIR assess the potential impacts of permitting construction on slopes of 30 percent or more, as would take place in the RUL expansion area west of Foster Road.**

**Response:** *See Response to Comment 27.58*; DEIR page reference is 3.8-3 regarding slope hazards. The characterization of the Foster Road area as having 30% or greater slopes is incorrect. The City Hillside development regulations (Zoning Ordinance) would apply as an implementation of General Plan Policies in all areas with severe slopes.

- 27.60G Commentator is concerned that Policy HS-3.9 would enable increased floodplain development if flood control solutions are not underway or funded by the year 2000. Commentator indicates that this would conflict with the stated objectives of the Draft Policy Document.**

**Response:** Any development that would occur without the flood control project would be subject to the same restrictions that are in place today. The limited level of development within the floodplain, particularly residential, is evidence of the dis-incentive to development that these conditions/regulations provide.

- 27.61G Commentator suggest revising Policy HS-3.2 to require new development to demonstrate how it will affect downstream flows and flood potential.**

**Response:** The floodplain management regulations contained in Napa Code Chapter 17.62 do this.

- 27.62G Commentator suggest revising Policy HS-3.6 to emphasize alternative flood control solutions that maintain the natural functions of the Napa River.**

**Response:** *See Response to Comment 24.40.*

- 27.63G Commentator suggests a new policy (Policy HS-3.10) that would require that flood control channels be kept in functioning condition.**

**Response:** *See Response to Comment 24.41*

- 27.64G Commentator suggests that the City investigate the possibility of combining restoration and flood control efforts.**

**Response:** *See Standard Response Flood Control and Response to Comment 24.7*

## **28. Napa County Conservation, Development and Planning Department November 21, 1996**

- 28.1G Commentator requests that the Draft Policy Document be amended to include policies ensuring that development in the area referenced in Addendum #1 is consistent with adjacent unincorporated area zoning.**

**Response:** The 5 acre parcel of land at the north east corner of Trancas and Silverado Trail is within the City limits and currently subject to the City's regulations. Addendum #1 provides a land use designation for the property as required by State Law for all lands within the City's jurisdiction. The TC, Tourist Commercial designation allows for tourist related uses including visitor serving uses that emphasize the historic role of the Napa Valley in viticulture. By placing the RUL around the property, the RUL policies can be applied to ensure that the unincorporated land beyond the property is preserved for agricultural



uses. The suggested policy change will be subject to City Council consideration during the General Plan hearings.

- 28.2E** Commentator requests that the DEIR be revised to address impacts associated with development in the area referenced in Addendum #1, with traffic being of particular concern.

**Response:** The City's General Plan traffic consultant has indicated that the potential development that could occur on the 5 acre parcel is not of a magnitude to cause any change in LOS conclusions for the purposes of General Plan analysis of the citywide circulation system. Localized improvements and other mitigations may be required as a result of project level CEQA review as would be the case with other future development projects that might be enabled by this General Plan.

- 28.3G** Commentator reminds the City that certain lands south of the city and east of Highway 221 are designated as urban on the County's general plan, and requests that Addendum #2 reflect this fact.

**Response:** The Draft General Plan Addendum #2 is intended to carry forward the current City designated Greenbelt lands outside the RUL. Exhibit C in Addendum #2 is intended to apply Greenbelt designation to County parcels reserved for agriculture and open space purposes and it is the City's intent to support the County policies in preserving the integrity of these areas. Detailed information would be appreciated so that the Greenbelt designations in Addendum #2 can be adjusted to correctly reflect County policy.

- 28.4G** Commentator urges the City to add a provision to its Housing Element that calls for the City to enter into a joint program to share housing credits per AB 3456.

**Response:** See Response to Comments 12.6 and 13.9.

## **29. Napa County Local Agency Formation Commission November 26, 1996**

- 29.1E** Commentator requests that the DEIR be updated to assess to the potential environmental effects of development of the area described in Addendum #1.

**Response:** The circumstances related to the parcel on the north east corner of Trancas and Silverado Trail that is the subject of Addendum #1 are similar to those that apply to the Stanly Ranch (*See Standard Response Stanly Ranch*). The land has been a part of the City for many years and (unlike the Stanly Ranch) is within the City's Sphere of influence. Modification of the RUL line to include the property does not change its current potential for urban development since it is already within the City's jurisdiction. Therefore, the adjustment is not growth inducing or inconsistent with any LAFCO policies. RUL policies applied to the property will establish a clear statement that the land adjacent to and surrounding the parcel are not appropriate for urban development (currently the RUL policies cannot be applied to this property). The City Draft General Plan Addendum #2 strengthens this policy by designating these areas as greenbelt.

**30. Susan Rushing-Hart**  
**December 2, 1996**

- 30.1E** Commentator does not feel it would be appropriate for the Planning Commission to pass the General Plan because "it is inundated with inadequacies, pertinent information is not readily accessible, or it has not been sufficiently proofread."

**Response:** The comment contains generalized assertions regarding the inadequacies of the DEIR. See *Standard Response CEQA applications to General Plans and other Standard Responses as well as Response to Comments 1.1, 27.1, 18.2 and the responses to Communication #19* (also written by the commentator). This entire response document attempts to identify and address questions on the DEIR and General Plan documents.

- 30.2E** Commentator would like the Draft General Plan to be open for public review for a longer period of time.

**Response:** See *Introduction - EIR Process and Standard Response CEQA Application to General Plans as well as Response to Comment 18.1*. It should be noted that the Draft General Plan is available for review and comment up until the day of final adoption by the City Council. Hearings on the General Plan have not yet commenced and will begin after the 45 day recirculation and public review of the Revised DEIR and this Response to Comment document.

- 30.3E** Commentator would like to know where the general public can access the City's *Futures Report*.

**Response:** The Futures Report is available for public review at the City Planning Department, 1600 First Street, Napa, Ca. and at the reference desk at the City/County Library.

- 30.4E** Commentator questions the rationale for rejecting Reduced Growth Alternative 1.

**Response:** The DEIR page 5-11 provides the analysis of Reduced Growth Alternative 1 and demonstrates that it does not meet objectives 2, 5 and 6 of the General Plan as listed on page 5-1 of the DEIR. The Alternative has not technically been "rejected" until the City Council considers the DEIR, certifies the adequacy of the document and actually adopts a General Plan.

- 30.5E** Commentator questions how DEIR Reduced Growth Alternative 2 would create greater impacts in certain areas.

**Response:** The first two paragraphs of DEIR Chapter 5 explains that CEQA requires that alternatives that can feasibly attain the basic objectives of the project be considered. The most viable alternatives are those that share the same fundamental objectives that have guided the formulation of policies articulated by the Draft Policy Document. The DEIR analysis of Alternative 2, the Reduced Growth Alternative, acknowledges that most environmental impacts will be equal to those of the Draft Plan but questions whether the City will be able to effectively satisfy objectives 2, 5 and 6 as listed on page 5-1 of the DEIR. The most significant question is whether the across-the-board reduction in residential densities would enable the City to promote affordable housing in the future as limited land supply continues to increase the cost of housing in the RUL. By doing so, this alternative would frustrate efforts to satisfy the City's regional fair share housing requirements thereby jeopardizing the availability of critical funding needed to support affordable units as housing prices increase. Such policy trade-offs are subject to Council consideration as they review the DEIR and consider the Alternatives during the public hearing process.

- 30.6E** Commentator requests clarification of statements concerning housing and historic buildings.

**Response:** The meaning of the referenced text is that the Draft General Plan reduces densities in historic neighborhoods in order to preserve neighborhood character and eliminate pressures to demolish historic buildings and replace them with higher density housing projects.

**31. Louise Clerici  
December 2, 1996**

**31.1G Commentator suggests revised language concerning the 1975 General Plan.**

**Response:** *See Response to Comment 11.2.*

**31.2G Commentator points out typographical error.**

**Response:** The General Plan text will be revised as suggested.

**31.3G Commentator points out the absence of a definition for "quantified objectives".**

**Response:** The General Plan text will be revised as suggested.

**31.4G Commentator suggests different zoning ordinance revisions be done in same time frame.**

**Response:** The time frames shown in the Draft General Plan will be subject to consideration by the City Council prior to adoption. Later time frames are proposed for Zoning Ordinance modifications that will require special study, staffing and funding and which are not essential priorities for Land Use consistency purposes.

**31.5G Commentator suggest the term platting be included in the Appendix A Glossary.**

**Response:** The General Plan text will be revised as suggested.

**31.6G Commentator asks where the standards are for protecting neighborhood character.**

**Response:** These standards are set out primarily in the Zoning Ordinance.

**31.7G Commentator notes typographical error.**

**Response:** The General Plan text will be revised as suggested.

**31.8G Commentator questions definition of single family attached unites.**

**Response:** The definition of "single family attached dwelling" will be revised.

**31.9G Commentator points out an apparently erroneous reference to 1995 in the Housing Element.**

**Response:** Updating of the Housing Element is not statutorily mandated until 1999. Since the Housing Element will not be amended as part of the 1996-97 General Plan update, the 1995 date will not be changed.



**31.10G Commentator wants definition of “catchment” area.**

**Response:** References to "catchment" will be eliminated.

**31.11G Commentator requests map of liquefaction potential.**

**Response:** The Draft General Plan Background Report contains such a map as identified in Figure HS3.

**31.12G Commentator requests clarification of dam failure inundation as described on page 8-14 of Policy Document.**

**Water Division Response:** The statements in the Draft General Plan are taken from data included in the Draft General Plan Background Report, page 8-28. The estimated inundation levels at Trancas Street for dam failures at Hennessey Reservoir and Milliken Reservoir are correct. The depth of flooding is dependent on the amount of water released, the channel cross-section and the length of time it takes the water to get to the point of interest. In the case of Conn Dam failing, the water released has a long distance to travel and very wide area over which it can spread as it flows down the Valley towards the City of Napa. Even though Milliken Reservoir is much smaller, the travel distance to Trancas Street is much shorter and therefore, there is much less time for the water to spread out as it makes its way down into town. Also note that Trancas Street crosses Milliken Creek before the creek discharges into Napa River. As shown in Table HS-5 of the Background Report, the inundation levels drop rapidly once Milliken Creek discharges into the Napa River, as the Napa River has a much greater carrying capacity.

**31.13G Commentator asks for definition of "low mobility".**

**Response:** The term “low mobility” summarizes the types of uses normally not acceptable in Zone D based on the Airport Land Use Compatibility Plan Criteria. A definition will be added to the glossary as follows: “*Low Mobility Use* A use involving a concentration of people that would require assistance, supervision or special transportation means to move efficiently from a site or building, such as schools, hospitals or nursing homes.”

**31.14G Commentator points out typographical error.**

**Response:** The General Plan text will be revised as suggested.

**31.15G Commentator questions criteria for evaluating parcels for likelihood of development.**

**Response:** Page C-2 of the Policy Document (excerpted from the Concept Report) discusses the capacity assessment criteria used for evaluating potential infill development. It should be noted that appendix C was included to provide background information and that it refers to other information that is included in the Concept report, but which has not been excerpted for Appendix C. If the City Council feels that additional clarification of background data is needed it could be included in Appendix C by way of a footnote that refers the reader to the Concept Report for further information.

**31.16G Commentator requests definition of "median".**

**Response:** The General Plan text will be revised as suggested: "Median- the mid-point in a range of numbers".

**31.17G Commentator requests definition of "Map Reference Area (MRA)".**

**Response:** The referenced text of Appendix C is extracted from the Concept Report description of the capacity analysis process used for the Draft General Plan. MRAs appear to have been developed as an analytical tool during the CAC concept development process to accomplish subarea analyses that would relate to both neighborhood identity and infrastructure planning; eventually leading to the Pod assignments found in the Policy Document.

**31.18G Commentator points out absence of map referenced in text.**

**Response:** Map will be included as suggested.

**31.19G Commentator points out typographical error.**

**Response:** The General Plan text will be revised as suggested.

**31.20G Commentator points out typographical error.**

**Response:** The General Plan text will be revised as suggested.

**32. Charles W. Shinnamon  
December 1 1996**

**32.1E Commentator objects to the widening of Soscol from Imola to Lincoln to six lanes as an assumption or mitigation measure in the EIR.**

**Response:** The question of need for additional traffic capacity in the Soscol Avenue corridor was addressed during the preparation of the Draft General Plan by looking at several alternatives, including the development of a new roadway between and parallel to Soscol Avenue and Silverado Trail. That alternative would have made use of Burnell Street and McKinistry Street. This alternative was rejected as being less practical than a potential future widening of Soscol Avenue. The projections from the traffic forecasting model indicate that, at their current widths, both Soscol Avenue and Silverado Trail would operate in excess of the City's Service Level policy at the buildout of the General Plan. However, it was also the Consultant's judgment that while the model might indicate such a condition, the condition was of a type that might or might not happen - the degree to which the service level policy would be exceeded was not so great as to warrant a major improvement program. The suggestion instead of a major widening program, and the policy included in the Draft General Plan, is that this location be monitored for traffic problems, and that the City establish a policy of protecting right-of-way in the corridor as future development occurs so that, if a widening project were necessary, then it can be accomplished with the least disruption and/or cost possible at the time.

**32.2E Commentator suggests the traffic model be run without assuming the Linda Vista Avenue bridge and the Solano Avenue bridge.**

**Response:** The projects listed above were included not to respond to specific capacity concerns but rather to improve overall circulation within the respective portions of the community. The system could function adequately without them, but they are judged to have value for providing better connectivity within the city.

**32.3E Commentator is confused by the letter from the CMA (Appendix C) and would like clarification.**

**Response:** The Napa County Congestion Management Agency is charged by State statute with insuring that the standards of the Napa County Congestion Management Program are maintained. New development projects have the potential to create conditions that would cause these standards to be exceeded. The CMA has developed a set of criteria for determining if a proposed development project might create those kind of conditions. One criterion is that if, in any of the zones of the traffic model, an increase of 500 or more trips would occur as the result of new development, then the project is deemed to be of such significant size that a conformity analysis is required. The conformity analysis includes producing a forecast for the year 2000 and determining if the CMP Service Level Standards are exceeded. The initial test run for the Napa General Plan indicated that in no zone would the growth to the year 2000 exceed 500 trips in any one zone. Thus, no further analysis was required to satisfy CMA requirements.

**32.4E Commentator feels it is imperative that the EIR discuss how traffic generated by the Airport Specific Plan will impact the city of Napa.**

**Response:** The issue raised by the commentator is the proper province of the Airport Area Specific Plan EIR. Information on that subject will be found in that DEIR.

**32.5E Commentator questions whether the General Plan overstates the amount of developable land for commercial and industrial development within the RUL and, if true, how this might affect the achievement of the City's jobs/housing goals.**

**Response:** The development potential projected by the Draft General Plan was based on a parcel specific analysis conducted by Planning Staff. Details of this analysis are presented in the "Employment Capacity Analysis Methodology" described on page Ixxii of the General Plan Concept Report (Appendix IV). Since these are the best and most recent data available, they were used for forecasting jobs/ housing figures.

**32.6E Commentator questions the projection of 1,277 new homes in the Linda Vista Planning Area and the effects on the jobs/housing balance.**

**Response:** The Linda Vista development potential is derived from the density ranges designated by the Linda Vista Specific Plan. Due to the time frame for preparation of this General Plan, it may now represent dwelling units that have been constructed since the data were established for the General Plan in 1992. Regardless, the potential dwelling units for the Linda Vista area was considered in the calculations of jobs / housing balance.

**33. Mark Brewer  
December 2, 1996**

**33.1G Commentator opposes Souza Lane extension.**

**Response:** See Response to Comment 22.1.

**33.2G Commentator opposes any down zoning of his property, particularly in view of the stated goals (H-1 and H-13) of maintaining sufficient housing opportunities in Napa.**



**Response:** The current land use designation for the western portion of the commentator's property is high density residential. The Draft General Plan proposes to change this designation to SFI with a density range from 4 to 8 dwelling units per acre. Changes in land use designations and densities are a fundamental consideration in a General Plan update and will be subject to review by the City Council. The commentator's concern for his property should be addressed to the City Council during hearings on the Draft General Plan.

**34. Muriel Fagiani  
December 2, 1996**

**34.1E Commentator asks for clarification regarding the status of the Redevelopment Plan and the reason it is not incorporated into the General Plan.**

**Response:** The redevelopment plan, as required under State redevelopment law, is intended as a general statement of goals and policies to guide redevelopment. The "Urban Redevelopment Plan/Parkway Plaza Redevelopment Project", the City of Napa's redevelopment plan, was originally adopted in 1969. At the time of its adoption the redevelopment plan was consistent with the City's General Plan. The General Plan and Zoning Ordinance have been amended and updated many times since then. However, there is no requirement in redevelopment law or any other provision of State law, that requires subsequent amendment of the redevelopment plan whenever a city's general plan or zoning ordinance change. In fact, the text of the City's redevelopment plan expresses an intention to comply with the City's General Plan and Zoning Ordinance on an on-going basis. The text sets forth this intention in Part I, Article V, Section B, Predominant Land Use Provision, of the plan on pages 11-12.

**35. Ray Valeri  
November 29, 1996.**

**35.1E Commentator feels the DEIR does not adequately address the impacts of Stanly Ranch development. Commentator feels a small resort development would be appropriate but that 600 homes is too much development for Stanly Ranch.**

**Response:** *See Standard Response Stanly Ranch.*

**36. Judy Irvin  
December 2, 1996**

**36.1G Commentator feels the Draft General Plan does not adequately consider the higher number of illegal, substandard flood-prone units in Planning Area 8 (Central Napa).**

**Response:** See Implementation Program HR-i.J on page 6-5 of the Policy Document. This policy augments the current City regulations for addressing non-conforming uses and structures and would

enable more aggressive action by the City if deemed an appropriate commitment for funding and staffing by the City Council.

**36.2G Commentator feels policies to "retain neighborhood character" are designed to keep low income housing in historic neighbors and out of affluent suburbs.**

**Response:** Policy comment noted; no response necessary.

**36.3G Commentator recommends policies to encourage density transfers.**

**Response:** The commentator's concern is based on the higher density projects that were developed in historic neighborhoods as a result of land use designations of the 1982 General Plan. The Draft General Plan reduces densities in these neighborhoods in keeping with the pattern of land use that exists and effectively transfers densities throughout the RUL from what was assigned in the 1982 Plan in order to provide for future residential growth in a way that recognizes existing neighborhood character.

**36.4G Commentator recommends policies to encourage dispersal of affordable housing throughout the city and a preponderance of owner-occupied housing in all planning areas.**

**Response:** See *Response to Comment 12.6* regarding the status of the Housing Element. Policy comment noted; no response necessary.

**36.5G Commentator recommends increasing the allowable FAR in downtown from 2.00 to 3.00 or 3.50.**

**Response:** Increased FAR assignments would be subject to City Council consideration during the General Plan hearings. It should be noted that an increase in FAR's for the downtown area could encourage new development on underutilized properties (many with historic buildings) and that this could severely affect the character and scale of the downtown. For example, if future economic conditions result in a demand for additional floor area in the downtown, older 2-story buildings would be less desirable from an economic standpoint, than new 3-story buildings.

**36.6G Commentator feels traffic has negative impacts on historic resources.**

**Response:** The basis of the commentator's claim is unclear. Comment noted; no response necessary.

**36.7G Commentator requests that Table 3-2 in Policy Document (Street and Highway Classification System) include a category for Historic Roadways.**

**Response:** The grid streets in Planning Area 8 meet the standards for local residential streets. Arterials and collector streets are identified on Figure 3-1. It is unclear how the suggested "historic roadway" classification would function differently from a transportation standpoint.

**36.8G Commentator suggests Lincoln Avenue be designated the gateway to downtown and that through traffic should be discouraged within historic downtown neighborhoods.**

**Response:** The commentator suggests significant alterations to the historic flow of traffic to and from the downtown area that would require major modifications to the city's circulation plan and exhaustive evaluation and analysis. Such changes would alter traffic distribution and travel patterns citywide and would have repercussions on land use and other aspects of the General Plan. Since this was not a component of the land use scenario of the Concept Report confirmed by the City Council, it has not been considered in the preparation of the Draft General Plan and traffic modeling.

**36.9G Commentator feels the Draft General Plan does not adequately address the shortage of parks and open space in Planning Area 8 (Central Napa).**

**Response:** Commentator's claim of internal inconsistency of the Parks and Recreation Element is not supported by adequate information to allow for a comprehensive response. Future park needs are described on page 5-2 of the Policy Document and indicate that additional community park facilities are needed in Quadrant 2, Central Napa; recognizing, however, the historic character and other constraints may prevent the existing park (Fuller) from being developed to provide many of the functions of a community park. This paragraph offers further discussion of opportunities to address deficient neighborhood park access through purchase or lease of surplus school sites or establishment of a joint use agreement on school property to help meet neighborhood park needs in underserved neighborhoods.

**36.10G Commentator feels Draft General Plan does not adequately address open space that may be made available by the flood control project.**

**Response:** *See Standard Response Flood Control.*

**36.11G Commentator says DEIR incorrectly equates Onasatis and the Coast Miwok.**

**Notes:** *Revise text on page 3.5.1 of DEIR and page 6-1 of Background Report as noted.*

**Response:** Comment acknowledged. The most ancient people to have occupied the Napa area were the Onasatis. They were a separate language group, different from the Miwok. Page 3.5-1 of the Draft EIR equates the original inhabitants (Onasatis) with the Miwok; probably because the Historic Preservation chapter of the General Plan Background Report calls the Penutian language group (who settled where the River meets Napa Creek) "the Original Napans, most likely related to the Coast Miwok." (Page 6-1 of General Plan Background Report.) The text of the background report will be revised to eliminate the sentence "*The original Napans were most likely related to the Coast Miwok*". The Cultural Resources section of the DEIR (page 3.5.1) will be revised as follows: "*The first Napans called themselves "Onasatis", the Outspoken People. These original Napans ~~were most likely related to the Coast Miwok~~ and lived in the vicinity of modern Napa until the early 1800s.*"

**37. John Clifton  
December 2, 1996**

**37.1G Commentator suggests page 17 of the Draft Policy Document be reworded to reflect the serious aspects of making changes to the neighborhood character and typology concept.**

**Response:** Comment noted. The recommended changes in the draft policy language can be presented to the City Council during hearings on the Draft General Plan and DEIR.

**37.2G Commentator feels specific plans should be prepared for Planning Areas 8 (Central Napa) and 9 (Soscol).**

**Response:** *See Response to Comment 24.6.*



**37.3G Commentator supports upgrading of "seismically impaired" buildings to allow for residential uses on the second and third floors and suggests downtown be designated Downtown Commercial Residential.**

**Response:** Policies under Goal HS- on page 8-2 are intended to address seismic safety considerations for buildings. In addition, Policy HR-1.13 and Implementation Program HR-1.N and HR-1.O in the Historic Resources Element support seismic rehabilitation of older buildings. Policy LU-6.3 and LU-6.7 and Implementation Programs LU-6.B and LU-6.E in the Land Use Element also support rehabilitation of older structures and the integration of residential uses into the downtown. Finally, the Draft General Plan establishes a DC-Downtown Commercial land use designation which applies to the city's historic commercial area and provides for retail administrative, institutional, recreational and other uses and specifically states that higher density residential uses and mixed residential and commercial uses are desirable at residential densities ranging from 10 to 40 units per net acre. The intent of these policies is to foster use/re-use of older buildings as described in the comment.

**37.4G Commentator suggests the Center for Wine, Food and Arts be designated as a separate planning area.**

**Response:** A Planned Development Permit was approved for the Center project on January 21, 1997. An EIR was certified as being adequate to address the project impacts related to Center development. The project is consistent with the land use and zoning which existed when approved and will be consistent with the proposed designations of the Draft General Plan. It does not appear to warrant any special planning area consideration.

**37.5G Commentator suggests the floodway be designated as a separate planning area.**

**Response:** *See Standard Response Flood Control.* The City already employs a Floodplain Zoning Overlay to address development in the floodplain. The Draft General Plan maintains the adopted Flood Evacuation Area which restricts development in flood prone areas for safety reasons; and will continue these regulations until safety considerations are adequately addressed through flood control or by other means. See text and policies under Goal HS-3 regarding flood risk on pages 8-9 through 8-13 of the Draft Policy Document

**37.6G Commentator opposes development of "flag lots" unless there are absolutely no other alternatives.**

**Response:** The City currently has adopted zoning standards for flag lot development. Such development is many times the only alternative available for infill on existing, underdeveloped, long narrow parcels. Flag lot development allows the addition of dwelling units without significantly compromising the neighborhood character in terms of the street appearance of the lot and the preservation of the existing home.

**37.7G Commentator says resort plans, such as Stanly Ranch, should require a supply of housing to meet the needs of permanent employees.**

**Response:** *See Standard Response Stanly Ranch.* Employee housing is included in the recently submitted specific plan application. Policies in the Housing Element are intended to address housing needs for all levels of income, including families with income generated from resort development.

**37.8G Commentator feels all residents in the designated neighborhoods, not just those within a short distance of the project, should be sent individual public notices of all infill projects.**

**Response:** The City already has adopted a policy to exceed minimum required mailed notice requirements based on certain thresholds of project development. Any special notice consideration for infill development (which is not included in the current city policy) will be subject to City Council consideration.

**37.9G Commentator feels that Chapter 3, Transportation, should include a plan for future housing development.**

**Response:** Staff believes that Chapter 1 (Land Use) and Chapter 2 (Housing) fully and adequately address future housing at the General Plan program level and that no additional discussion of housing is needed in Chapter 3.

**37.10G Commentator feels City and school bus programs should be more integrated and that the bus system should be less dependent on subsidies.**

**Response:** Policy comment noted; no response necessary.

**37.11G Commentator feels the rail transportation between Napa and Vallejo could reduce the traffic load on Highway 29.**

**Response:** Policy comment noted; no response necessary.

**37.12G Commentator requests that General Plan demonstrate the changed relationship of Soscol Avenue and the River as represented by the "flood plan" and include a recommendation that Hwy 121 be changed from Silverado Trail to Soscol Avenue.**

**Response:** The comment is part editorial and part a recommendation. The editorial seems to be a comment on the mapping of Soscol and the River and is the commentator's offer of a future circulation opportunity that could coordinate with a flood control design. The potential for 121 to be relocated from Silverado Trail to Soscol Avenue is a Caltrans consideration. With respect to any special circulation options that may result from an adopted flood control project, *see Standard Response Flood Control*.

**37.13G Commentator feels the Policy Document should consolidate all environmental issues in one section.**

**Response:** The purpose of the DEIR is to identify, consolidate and analyze environmental issues. See the Response to Comment 46.1 regarding the use of separate volumes for General Plan and EIR documents.

**37.14G Commentator suggests the General Plan include and incorporate the Clean Cities program, in which the City already participates.**

**Response:** The City currently participates with other public agencies and private organizations to implement programs to improve air quality. Many of the Clean City programs are supported by the air quality policies that are consolidated in Appendix E of the Policy Document.

**37.15G Commentator recommends an Economic Section in the General Plan to establish an ongoing evaluation of each new development and change in the demographics of both the City and County.**

**Response:** *See response to comment 1.1G.*

**37.16G Commentator suggests editorial changes.**

**Response:** The General Plan text will be revised as suggested.

**38. State of California Office of Planning and Research  
November 18, 1996**

**38.1E OPR informs City that no state agency comments were received through the formal clearinghouse process.**

**Response:** No response necessary.

**39. Napa County LAFCO  
December 18, 1996**

**39.1 Commentator informs city that LAFCO will defer review of the Draft General Plan and DEIR until the City of Napa Planning Commission has reviewed and made recommendations on the documents.**

**Response:** No response necessary.

**40. Napa Valley Wine Train  
January 6, 1997**

**40.1G Commentator outlines concerns and suggestions concerning a riverwalk along the Napa River in Downtown.**

**Response:** Policy/design comments related to flood control project noted. For relationship of the flood control design process to the Draft General Plan process *see Standard Response Flood Control*.

**40.2G Commentator urges City Council to reconsider its decision on First Street.**

**Response:** Land use policies under the Downtown section of the Draft Policy Document (starting on Page 1.17) will enable the City Council to consider circulation options in the future that would enhance the viability of the Downtown commercial area. See Policies LU-6.1, LU-6.6 and LU-6.11.

**40.3G Commentator suggests moving Soscol to McKinstry/Burnell Streets if Caltrans will pay for bridge and right of way.**

**Response:** It is not clear from the comment what the land use or environmental basis for this recommendation is. Relocation of the State Highway is a Caltrans consideration. The recommended



relocation would offer no citywide circulation benefits based on the traffic analysis prepared for the Draft General Plan.

**41. Napa County Farm Bureau**  
**January 6, 1997**

**41.1G Commentator opposes expansion of the RUL.**

**Response:** *See Standard Response RUL.* This policy concern can be presented to the City Council during hearings on the Draft General Plan.

**41.2E Commentator feels the DEIR does not adequately assess the impacts of developing Stanly Ranch.**

**Response:** *See Standard Response Stanly Ranch.*

**41.3E Commentator feels the Draft General Plan proposal to include an agricultural parcel east of Big Ranch Road in the RUL is a dramatic departure from current City policies.**

**Response:** *See Standard Response RUL.*

**41.4E Commentator feels the DEIR does not adequately assess the growth inducing impacts of development of Stanly Ranch and the area east of Big Ranch Road.**

**Response:** *See Standard Response Stanly Ranch and Big Ranch.*

**41.5E Commentator feels the DEIR does not address the adequacy of water supplies to support new development between now and 2012.**

**Response:** *See Standard Response Water Supply.*

**41.6E Commentator points out that the DEIR does not adequately address commercial development of the 5 acre parcel at the northeast corner of Trancas and Silverado Trail.**

**Response:** *See Response to Comments 28.1 and 28.2.*

**42. Louise Clerici**  
**February 6, 1997**

**42.1G Commentator suggests General Plan include local examples of residential projects built at various densities.**

**Response:** This is a helpful suggestion for supplementary information to assist readers in the understanding of residential densities proposed by the Draft General Plan. The information will be prepared for review during hearings if time and staffing permits.

## **Comments Received at October 17th and 24th, 1997 Planning Commission Public Hearings on the General Plan Draft EIR**

### **A. Muriel Fagiani October 17, 1996**

- A.1E** Commentator feels it is a mistake not to include in the EIR maps of the 1940 and 1986 floods to show the extent of flooding.

**Response:** The Draft General Plan Background Report contains several pages of discussion concerning flooding potential and the history of flooding in Napa (pages 8-19 to 8-26). This section of the background report includes a map of the 100 year Floodplain and Floodway (Figure HS-9) and a map of the Flood Evacuation Area (Figure HS-10). These maps reflect historical experience with the 1940 and 1986 floods.

- A.2E** Commentator expresses concern that Policy Resolution 27, which includes Standard Conditions of Approval, can be changed.

**Response:** Policy Resolution 27 contains standard mitigation measures that are designed to address typical impacts that would be expected to result from development. The incorporation of standard mitigation measures into project level environmental review is an efficient way to ensure that the City is addressing typical impacts for all projects in an equal and effective fashion. Policy Resolution 27 does not preclude the CEQA process for project level environmental review, but only makes it more efficient. Regardless of the future status of Policy Resolution 27 and its mitigation measures, projects would still be subject to CEQA review and impacts would need specified mitigations in the absence of standard mitigations. The DEIR recognizes that the City has an adopted set of standard mitigations along with a standardized monitoring program, to address typical impacts associated with future development that might be enabled by the General Plan.

### **B. Chris Malan October 24, 1996**

- B.1E** Commentator feels the DEIR does not adequately address the impacts of developing Stanly Ranch.

**Response:** *See Standard Response Stanly Ranch.*

- B.2E** Commentator feels Draft General Plan does not adequately address mass transit, therefore, provides no mitigation for traffic.

**Response:** Staff respectfully disagrees. Policies T-5.1 through T-5.16 and Programs T.5A and T.5B should collectively be useful in promoting mass transit use and in reducing traffic congestion.

- B.3E** Commentator notes there is no mitigation measure for replacement of the Imola Bridge for future roadway improvement No. 17 on page 3.3-7 in the DEIR.

**Response:** *See Response to Comment 16.2.*

- B.4E** Commentator says there is no mention in the DEIR of endangered species such as hard head minnow, the stickleback, and the bluegill that inhabit the river.

**Response:** *See Response to Comment 11.8.*

- B.5G** Commentator feels Draft Policy Document is "lacking" in implementation of wildlife corridors and riparian corridors along the Napa River.

**Response:** *See Response to Comments 19.9 and 24.26.* These policy concerns can be presented to the City Council during hearings on the Draft General Plan.

**C. Richard Nieman**  
**October 24, 1996**

- C.1E** Commentator feels the DEIR does not adequately address the impacts of development of Stanly Ranch.

**Response:** *See Standard Response Stanly Ranch.*

**D. Muriel Fagiani**  
**October 24, 1996**

- D.1.G** Commentator asks why Draft General Plan is published in three separate volumes.

**Response:** Each volume serves a different purpose and plays a different role. The Draft Policy Document is the primary document since it sets out the City's official policy for land use, development, and environmental protection. The Draft Background Report is purely a description of existing conditions and trends in Napa. These two documents will be formally adopted as the General Plan at the end of the update process. The Draft EIR is not a part of the General Plan.

- D.2.G** Commentator asks why there is no discussion of the Redevelopment Agency in the DEIR.

**Response:** *See response to Comment 34.1.*

**E. Dorothy Glaros**  
**October 24, 1996**

- E.1.** The Commentator makes several observations and suggestions regarding the Draft General Plan and DEIR review process. And believes that certain policies in the housing element are contrary to CAC discussions on the subject of affordable housing.



**Response:** *See Response to Comment 12.6* regarding the status of the Housing Element in the Draft General Plan. The other comments are suggestions for the public review process. No response is necessary.

**F. Planning Commissioner Mulford  
October 24, 1996**

**F.1E. Commentator finds it confusing that the City of Napa is described statistically in so many ways.**

**Response:** It is essential that the Draft General Plan be fully described in terms of its many aspects/dimensions. Impact analysis, for instance, cannot be conducted without such information.

**F.2E. Commentator feels the DEIR does not adequately address the impacts of existing development.**

**Response:** This is not so much a CEQA issue for the DEIR as it is a policy issue for the General Plan. CEQA requires analysis of proposed changes that may negatively affect the physical environment, not existing incompatibilities that are the result of past decisions.

**F.3E. Commentator feels the reasons why Reduced Growth Alternative 2 is not the preferred alternative are weak and elaborates.**

**Response:** *See Response to Comment 30.5.*

**G. Planning Commissioner Hover  
October 24, 1996 (Oral Comments at Hearing)**

**G.1. Commentator would like the DEIR to name the exact species that inhabit all sites within the city as opposed to a more general reference.**

**Response:** *See Standard Response CEQA Application to General Plan EIR* . It is beyond the scope of a general plan or a general plan EIR to list all wildlife species on a parcel by parcel basis. Parcel specific information can be prepared at the point there is a more specific proposal that would affect the parcel.

*End of Responses*



# **APPENDICES**

## **COMMENT LETTERS AND HEARING MINUTES**







# Chamber of Commerce

October 15, 1996

Chair, James Mulford and  
Planning Commission Members  
City Hall  
Napa, California

RE: Napa City General Plan

Dear Chair Mulford,

The Napa Chamber has been following the development of the General Plan for the City of Napa for a number of years, and, now that it is up for final approval, we would like to make comment.

Three years ago we assisted the City by conducting well-attended and professionally facilitated meetings with local business owners and community leaders. We feel that valuable groundwork was developed towards the creation of an Economic Element for the General Plan; which is something that is believed by many (including the Planning Department) to be a crucial aspect of a solid General Plan. Discussed in those meetings were major land use issues that are of great economic consequence and benefit to the community such as the Flood Control Project and the Airport Specific Plan. These issues are key examples of what the General Plan should address in order to provide a sound business plan for the future of the City of Napa.

We feel that the General Plan is a good plan and applaud John Yost and his staff for their efforts; but, we also feel that it is incomplete without an Economic Element. Therefore, we believe and request that prior to the approval of the General Plan, a resolution must be adopted, and allowance in the budget be made, for the development of an Economic Element. As we have in the past, the Napa Chamber wishes to participate and offer any assistance we can in order that the Economic Element become a part of the General Plan of the City of Napa.



*General Plan, page 2*

Please let us know what your decision is so that we can plan to participate.

Sincerely,

A handwritten signature in cursive script that reads "Charles B. Bogue".

Charles B. Bogue  
President

cc - John Yost, Planning Director  
Mayor and City Council Members of Napa



# Friends of the Napa River

2.

The Landmarks Building  
1026 First Street • Napa, CA 94559  
Phone (707) 255-8646 • Fax (707) 255-2164

October 17th, 1996  
City of Napa Planning Commission  
Hearing on the DEIR of the General Plan

Moira Johnston-Block President of Friends of the Napa River responded to the DEIR for the Napa Urban Waterfront Restoration Plan in January of 1992. In her response she asked for "consistency and integrity of design" along the Urban Water front. The response she received was there were no policies and guidelines in the Napa General Plan to evaluate the proposed project. I am submitting to you a copy of her letter and the response. When the American Center for the Food, Wine and the Arts were evaluating the traffic concerns they stated they found no guidance in the General Plan. We find the same lack of detail in this General Plan. Therefore tonight we are submitting guidelines for use along the Urban River Front to be incorporated into the General Plan. We also are submitting the policy statements and implementations taken out of the Plan that directly reference the Napa River Watershed. We would like these placed in an appendix like the one on Air Quality, Parks and Recreation etc.

2.1

2.2

It is confusing to be here tonight discussing the Environmental Impact report when we have many additions to the policies, implementations, glossary and comments on the policies themselves. We have worked hard in ten days to come up with response that would make our input meaningful. It seems to have the very best EIR and General Plan you must get the response to the Plan First.

The Parks and Recreation element is very clear and precise about the numbers of people a park will serve in a radius where the trails will be etc. The transportation section seems very detailed but when there is a discussion of stormwater management in the community services section there is a lack of detail likewise in the Natural Resource section.

In the section on stormwater drainage (4-13) creeks are described as natural drainage channels an integral part of the stormwater drainage system along with pipes and culverts. We must stop overloading our creeks with stormwater runoff over and above the runoff that would have occurred on vacant land with trees and grass. Not only are we increasing the volume we have increased the speed. This has a detrimental effect on a natural living waterway.

2.3

We also need to make a commitment to not covering our creeks or forcing them underground. All development of 4 or more homes must maintain runoff at predevelopment rates. The DEIR states there will be little additional runoff in the future

2.3 (3.9-3) because the majority of the land is already urbanized. However we have seen with relatively little development the back up in the stormdrains. We should not wait for state and federal regulations to kick in when our population hits 100,000 let's admit we are being impacted now and put our own regulations in effect. What are the regulations on development in the floodplain on 8-9 if they are there why haven't they been used? Do we need to make them more clear?

2.4 In the DEIR 3.78 #3 I find the admission that Land Use Policy 9.3 implies that development may occur on sites with sensitive resources. and then there is a description of the other land use policies that would allow for protection of the sites. However when you just read the policy and not the description of the policy you don't have any idea that the city could use it to protect sensitive areas. So we think maybe we should say exactly what the policy means. The policies read in that section "the city may or the city will encourage". It seems there are a lot of these its available if we choose to use it policies that could be read either way.

2.5 The narrative sections between the policies show a tremendous understanding of the natural resources, flooding issues etc: but when it comes to the policies after the narrative they are flimsy and vague.

2.6 Changing the zoning of the Stanley Ranch is a big change there must be some significant impacts which we do not see described. Like the number of trips to the store from the Stanley Ranch just to name one. If an area like that can be rezoned with a general plan can we change the zoning in the floodway to be openspace?

2.7 Why isn't there a conservation element to the plan maintaining, enhancing , restoring and creating riparian and wildlife corridors?

Friends of the Napa River will continue to work on comments and make more specific comments concerning the watershed elements of the plan. The economic future of this City depends on its greatest resource the Napa River.

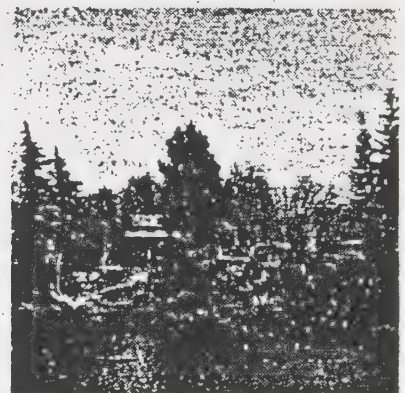
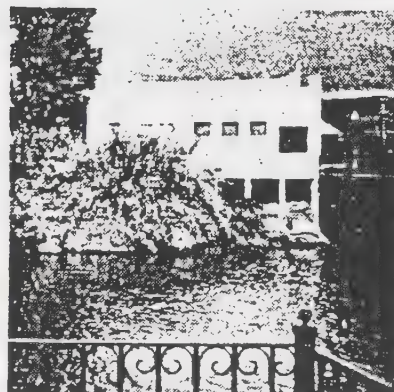
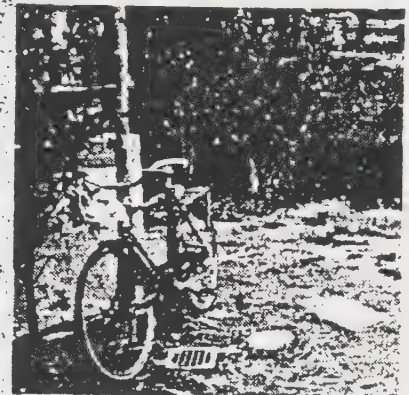
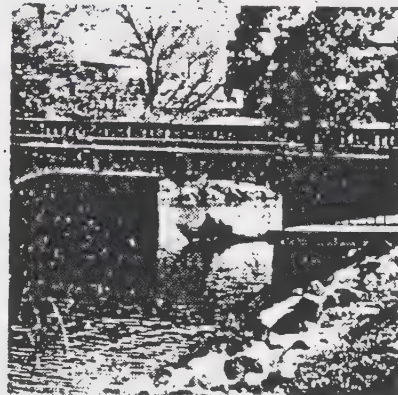
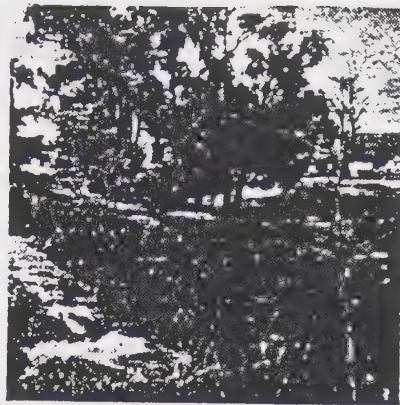
Thank-you



Judith Sears

Friends of the Napa River





## FINAL ENVIRONMENTAL IMPACT REPORT

# NAPA URBAN WATERFRONT RESTORATION PLAN

City of Napa, California

Richard Morehouse Associates



moira johnston

January 9, 1992

City of Napa  
Planning Commission  
1600 First Street  
Napa, Ca. 94559-0660



Dear Sirs:

I am sorry that illness made me unable to attend your meeting January 2, 1992 and present in person my comments on the Draft EIR for the Napa Urban Waterfront Restoration Plan. Gary Sampson graciously mentioned them in his testimony, and I would like now to express them as part of the public hearing process.

Although all aspects of the Plan are important to the creation of the wonderfully revived urban waterfront we all want, I will focus on the physical design aspects addressed in the Plan's Goals and Objectives on page 5, Section 3.1 -- on what could be termed the aesthetic components of the plan. I think that it is in this realm that the greatest positive impact can be made to urban life along the riverfront, but also where the worst disasters can occur if there is not cohesion of concept, and firm and intelligent design control. Good design is not a frill. It is fundamental to the success of this project. It is the way the assemblage of buildings, cafes, patios, piers and walkways looks and works that is going to make this either a mecca to Napa Valley's residents, a national (and even international) model of urban riverfront development -- or a mediocre, piecemeal effort that fails to seize one of the last great opportunities in Napa Valley to create something life-enhancing, something respectful and celebrative of the natural river resource.

Cohesion and control of design should, I believe, be included in the EIR as part of the environmental impact of the project. It is not. I believe that a commitment to world-class design and the establishment of design review and control is a requisite for the project, and should be included now at the EIR stage or, certainly, in the final stage of the plan that is to be implemented. I am not recommending a cutesy, psuedo-Victorian riverfront theme-park 'village'. But I am strongly recommending that consistency and integrity of design be assured, and that it be built into the

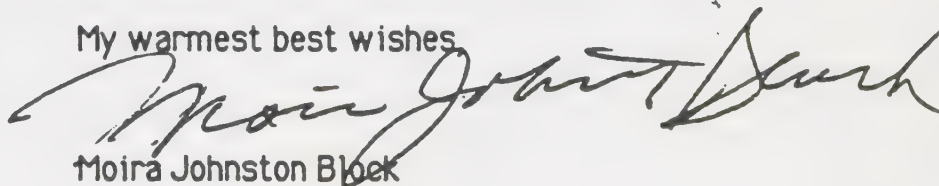
931 marina drive  
napa, ca. 94559  
ph. 707-257-6023  
fax 707-252-1782

project right now, at the EIR level, so that, as buildings develop over time, that consistency and quality will not be left to the whims of developers with their inevitably short-term, profit-driven vision. What we must prevent is the travesty that can be seen on the urban waterfront in Petaluma where a small mall has been built on the cornerstone river frontage downtown facing away from the river. It offers the view, literally, of the back doors and garbage cans of characterless rectangular boxes. I cite as an outstanding example of consistency the Granville Island project in my native Vancouver, Canada, where old and new buildings alike were unified by the authentic theme of corrugated metal roofs and sidings, the 'look' and materials of the industrial area that had existed -- and still exist -- on the site.

I do want to complement the Sasaki report's approach to the aesthetic/architectural elements of its goals and objectives; it is a sensitive, 'quality' approach with respect to scale, historic character, orientation to river, etc. But these are only guidelines -- recommendations. More specific protection of this environmental component is needed. I will be expressing my concerns to the General Plan Commission and to the City Council, as well, and would be happy to meet with you or any group to expand on these comments.

I thank you very much for your courtesy, interest, and sense of responsibility towards this vital project. I wish you wisdom, vision, and a little good luck in your deliberations and decisions.

My warmest best wishes

A handwritten signature in dark ink, appearing to read "Moira Johnston Block", written in a cursive style.

Moira Johnston Block

RESPONSE TO LETTER FROM MOIRA JOHNSTON

1. Inclusion of project design issues in the EIR. Impacts of project design on the environment under CEQA normally are limited to project compliance with policies and guidelines which are adopted by affected jurisdictions. In this case, there are no policies and guidelines in the Napa General Plan or other adopted plans against which to evaluate the proposed project. Therefore, the assessment of visual impacts of the project in Chapter 9 is limited to discussion of potential adverse changes to the natural environment, rather than changes to the built environment. Concerns about the urban design character of the project could logically be addressed at subsequent phases of design of project components.



## APPENDIX G

### POLICIES AND PROGRAMS RELATED TO WATERSHED

This appendix is a compilation of policies and implementation programs located in various sections of the *Draft Policy Document* that address watershed management issues.

#### Chapter 1: Land Use

- LU-1.7. The City shall enhance the Napa River as a natural corridor and recreational spine connecting neighborhoods, employment areas, and other destinations. (*See Chapter 5, Parks and Recreation*).
- LU-3.9. The City shall coordinate growth and development with surrounding jurisdictions, the Local Agency Formation Commission (LAFCO), Congestion Management Agency, Napa County Flood Control District, and other agencies as appropriate to maintain open space between communities and promote common goals.
- LU-6.4. The City shall promote riverfront development that reorients downtown to the Napa River and shall encourage creative designs during the development review process.
- LU-6.5. The City shall provide for development of hotel and conference facilities in the downtown area. The City shall encourage any hotel developer to tie the facility to downtown and riverfront restoration through physical improvements and joint promotional involvement.
- LU-6.6. The City shall enhance public access to the downtown, including a stronger link to downtown residential neighborhoods, through improvements to directional signs, roads, transit, and pedestrian and bike trails along streets and the river.
- LU-6.10. The City shall continue to support development of public amenities along the Napa Riverfront such as parks, plazas, trails, docks and landscaping.
- LU-6.A. The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial and recreational focus for downtown.
- Responsibility: Redevelopment and Economic Development Coordinator;  
Planning Department;  
Community Resources Department;  
City Council
- Time Frame: FY 00-02
- LU-9.1. The City shall promote an urban form that integrates the urban environment with the city's natural features.
- LU-9.2. The City shall continue to apply special development standards to proposed development within or adjacent to the following areas:
- Riparian corridors and wetlands (including the Napa River);
  - Hillsides;
  - Critical wildlife habitat; and
  - Agricultural land outside the RUL
- LU-9.3. The City shall encourage the maintenance of wildlife corridors (*as described in Chapter 7, Natural Resources*) and discourage the fragmentation of large natural plant communities when environmentally-sensitive sites are developed.

LU-9.5. When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council may reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings:

- a. The site has specific physical constraints which may include but not be limited to geologic, flood, fire, or erosion hazards, that substantially limit design and development alternatives; or
- b. The site has specific environmental or cultural resources which may include but not be limited to riparian or marshland/wetland areas, archaeological or other historical resources that would be adversely affected by a project developed at the minimum densities prescribed by the General Plan; or
- c. The site is adjacent to or close to (within  $\frac{1}{4}$  mile) of important agricultural resources or other areas devoted to permanent agricultural activities which in the City Council's judgment are significant and would be adversely affected by a project developed at the minimum densities prescribed by the General Plan.

LU-9.6. The City shall develop programs which mitigate potential flooding impacts along the Napa River to allow for efficient use and rehabilitation/development of lands near the river. *(See "Flooding" section of Chapter 8, Health and Safety.)*

## Chapter 3: Transportation

- T-9.3. The City shall develop a major public multi-use trail and amenities along the Napa River from Stanly Ranch to Trancas Street, and along Salvador Channel, while protecting the natural resources along the trail corridor. If feasible, establish a multi-use trail along the Wine Train Railroad right-of-way. *See also "Trails" section of Chapter 5, Parks and Recreation.*
- T-9.4. The City shall connect the city's major planned trails (*as identified in Chapter 5, Parks and Recreation*), to the proposed regional Ridge and Bay Trails, connecting all of these major pedestrian and bicycle routes to downtown.

## Chapter 4: Community Services

- CS-11.5. The City shall develop stormwater management programs to reduce water borne pollution discharges to the maximum extent practicable.
- CS-11.6. The City shall require new development to obtain all necessary NPDES permits as required by federal law.
- CS-11.7. The City shall require all new development to implement feasible best management practices (BMP) in the design of stormwater systems.
- CS-11.8. The City shall require all projects in the floodplain to comply with applicable federal, state and local regulations.
- CS-11.9. The City shall work with the California Department of Fish and Game and Napa County Resource Conservation District to develop an acceptable and appropriate homeowners' stewardship program aimed at reducing flooding along creek and river side properties.



## Chapter 5: Parks and Recreation

- PR-1.2. Citywide parks, open space areas and trails shall include both active and passive recreational amenities of significance to the whole city. The target standard for provision of citywide parkland shall be 6 to 10 acres per 1,000 residents. The service area of citywide sites includes the entire city and citywide facilities may be located in any part of the city. Sites in this category will typically be in excess of 50 acres, although some are less than 50 acres. Citywide facilities should include parking areas and restrooms. Citywide facilities are further defined as follows:
- Citywide Parks* include major active recreation facilities such as ballfields, or specialized facilities such as boat launches. Citywide parks should include provision for group activities including group picnic areas.
  - Citywide Open Space Areas* provide opportunities for passive activities such as hiking and picnicking.
  - Citywide Trails* provide connections within the city, and to regional trails. Citywide trails include the Napa River and Salvador Channel Trails.
- PR-1.5. The City shall improve community park service in the area currently under-served east of the Napa River (Quadrant 4) by acquiring a new site, by expanding an existing park, or through a joint use agreement with the NVUSD.
- PR-3.1. The City shall consider the Napa River and tributaries as a primary natural corridor that forms an organizing spine for the open space system within and extending beyond the city.
- PR-3.4. Where appropriate, the City shall locate new parks, trails, and overlooks adjacent to areas that are protected from development for reasons of resource protection, safety provision, or historic preservation, including areas along the Napa River and Salvador Channel, its tributaries, and on the hillsides, to provide contiguous open space areas, extend resource protection, and increase perceived or actual extent of publicly accessible area.
- PR-3.8. The City shall promote access to publicly-owned natural areas beyond the city, such as the Napa River marshlands, Skyline Park, and watershed areas where possible, via existing and proposed trail segments, to extend the passive open space recreational opportunities for Napa residents.
- PR-5.1. The City shall provide for a trail system that provides connections with open space areas in and outside of the city. In the city, trails should connect Kennedy Park, Westwood Hills Park, Timberhill Park, and Alston Park with the Napa River Trail. Outside the city, trail destinations should include the Napa Marshes, Skyline Park, watershed areas, and views of vineyards and other agricultural lands.
- PR-5.2. Trails shall be located off road, following creeks wherever possible. As trail opportunities are limited, on-road connections should also be included to link the off-road sections of the system. These connections should be included in the *Bicycle Facilities System*. The trail system should consist of the following components. Alignment possibilities are included in Appendix D.
- Napa River Trail south: east bank
  - River Trail south: west bank
  - River Trail north on Salvador Channel to Alston Park with connection to Las Flores Community Center

- d. Napa River Trail east to Skyline Park
- e. Napa River Trail to Westwood Hills and Timberhill city parks
- f. Other creek connections to the Napa River trail
- g. Connections to surrounding county areas

PR-5.7. In creekside areas, the City shall develop trails outside any riparian setback requirements wherever possible.

PR-5.12. The City shall identify potential linkages along easements and rights of way to publicly accessible open space lands in the Napa vicinity, such as the Napa marsh.

PR-5.18. Where trails are joint-use, such as for utility access and along flood control channels, the City may share capital improvement and maintenance costs.

PR-6.1. The City shall develop a major public multi-use trail and amenities along the Napa River from Stanly Ranch to Trancas Street and along the Salvador Channel,

while protecting and enhancing the natural resources along the trail corridor.

PR-6.2. The Napa River Trail shall be developed according to design guidelines adopted by the City.

PR-6.3. Trail development shall be consistent with protection and enhancement of wildlife habitats along the River. The City shall identify potential areas for habitat preservation and enhancement along the river during the preparation of trail design and development plans. The City shall design and locate the multi-use trail to minimize impacts to sensitive habitats and resources wherever possible.

PR-6.4. The City shall link the Napa River Trail to other trails, parklands and community resources including downtown and river-oriented businesses.

PR-6.5. The City shall provide trail access points, staging and rest areas, and other amenities, such as boat launches and enhanced fishing areas. Facilities should be designed to meet accessibility standards whenever possible. Facilities should accommodate boat traffic, including some oriented toward commercial/tourist river boating, as well as recreational boating.

PR-6.6. The City shall establish a continuous trail corridor and sites for trail-related amenities. The City shall pursue various methods for acquiring a trail corridor, including coordinating with other public agencies and utility companies and negotiating with property owners for an easement or fee title for a trail corridor.

PR-6.7. The City shall work with the Army Corps of Engineers to ensure that the Napa River Trail is incorporated into any flood control project.

PR-6.8. The City shall conduct appropriate site investigations to identify any contaminated soils and/or groundwater which could affect public health along the proposed trail and staging areas near the River and shall



identify mitigations to ensure adequate remediation.

- PR-6.9. The City shall obtain easements and develop the proposed improvements described in the *Napa Urban Waterfront Restoration Plan* whenever feasible.
- PR-6.10. The City shall establish financial strategies for acquiring and developing the Napa River Trail and facilities. These financial strategies may include the following:
- Allocate funds for Napa River Trail when appropriate and necessary to use as leverage for additional funding.
  - Pursue various grant and funding programs from public and private sources.
  - Establish donation program through the Foundation for Napa Recreation.
  - Organize special fund raising events.
- PR-6.11. The City shall prioritize and phase trail development, taking into account funding and acquisition opportunities.
- PR-6.12. The City shall identify and pursue feasible demonstration projects.
- PR-6.13. The City shall provide for long-term maintenance, safety and security of the trail.
- PR-6.14. The City shall prepare and adopt a trail sign program to address trail safety and etiquette.
- PR-6.15. The City shall provide adequate access for emergency and maintenance vehicles along the trail.
- PR-6.16. The City shall establish a strong connection between the community and the Napa River and its unique resources.
- PR-6.17. The City shall solicit participation of the business community in trail planning and development.
- PR-6.18. The City shall involve neighborhoods in the process of designing trail segments and amenities.
- PR-6.19. The City shall establish education displays for wildlife habitats, cultural and historic sites.
- PR-6.20. The City shall promote programs within schools which focus on the Napa River.
- PR-6.21. The City shall work with historic and environmental organizations to devise educational programs and events.
- PR-6.22. The City shall establish River Square, between First and Third Streets on the west side of the River, as a central active place of the community.
- PR-6.23. The City shall incorporate historic architectural elements in design of waterfront components, including renovation and reuse of historic structures such as the Hatt Building.

#### IMPLEMENTATION PROGRAMS

- PR-6.A The City shall establish an ongoing trail inspection and maintenance program.
- Responsibility: Community Resources Department
- Time Frame: FY 00-02
- PR-6.B The City shall establish a volunteer program to assist in trail cleanup and security patrols.
- Responsibility: Community Resources Department
- Time Frame: FY 00-02
- PR-6.C The City shall increase public access to the water at Veterans Park.
- Responsibility: Community Resources Department
- Time Frame: FY 02-04
- PR-6.D The City shall enhance access and development of China Point Park as the northern edge of River Square.
- PR-7.7. The City shall participate in annual cultural events (e.g., Napa Wine and Crafts Fair, Friends of the River Festival).



## Chapter 6: Historic Resources

- HR-1.16. The City shall work with other agencies to ensure that any future flood control project does not sever the historic relationship between the river and the adjacent historic neighborhoods and commercial areas.
- HR-1.18. The City shall identify its historic gateways and support the preservation of their historic bridges, stone walls, street trees and viewsheds.

- NR-1.5. The City shall pursue federal and state funding to restore and enhance wetland, riparian, and fish habitats.
- NR-1.6. The City shall require as a condition of approval that development provide protection for significant on-site natural habitat whenever possible. If such habitat cannot be avoided without loss of any economic use of the land, the City would permit equivalent mitigation off-site.

## Chapter 7: Natural Resources

- NR-1.1. The City shall protect riparian habitat along the Napa River and its tributaries from incompatible urban uses and activities.
- NR-1.2. The City shall identify existing wildlife habitat corridors and seek to protect them from being severed or significantly obstructed.
- NR-1.3. The City shall encourage the planting of native plant species in natural habitats.
- NR-1.4. The City shall review all future waterway improvement projects (e.g., flood control, dredging, private development), as well as all projects that are within 100 feet of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also encourage native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes, and enhance aquatic habitats.

- NR-1.7. During development review, the City shall endeavor to identify and protect significant species and groves or clusters of trees on project sites.
- NR-1.8. The City shall provide controlled access points in designated areas to prevent unrestricted public access to riparian habitat on public lands.
- NR-1.9. The City shall continue the existing program for hazardous waste collection events to allow the public to safely dispose of pollution-causing products.
- NR-1.10. The City shall pursue appropriate new management practices for reducing the impact of pollution from urban activities. *See Storm Drainage section of Chapter 4, Community Services.*
- NR-1.11. The City shall continue to enforce the Fire Prevention Abatement program to protect riparian habitat from destruction by fire.

NR-1.12. The City shall provide for the use of permeable or semi-permeable materials for parking lots and other off-street paved areas.

Responsibility: City Council;  
City Attorney;  
Police Department

Time Frame: FY 98-00

NR-1.13. The City shall require that the composting and recycling of landscape maintenance debris be located so as to avoid adverse impacts on wetland, riparian, and fish habitat.

NR-1.E The City shall continue to require implementation of sensitive construction practices that minimize erosion and sedimentation, protect important native trees, restrict riparian encroachment, and maintain unobstructed drainageways.

## IMPLEMENTATION PROGRAMS

NR-1.A The City shall review and modify as necessary existing regulations for the conservation and management of marsh, wetland, riparian, wildlife and plant habitats to ensure consistency with the General Plan.

Responsibility: Planning Department;  
Public Works Department

Time Frame: Ongoing

Responsibility: Planning Department;  
City Council

Time Frame: FY 02-04

NR-3.3. The City shall support stenciling storm drains to identify the location of direct inflow to waterways from storm drains.

NR-1.B The City shall continue to rezone properties in marsh, wetland, oak woodland and riparian habitats to be subject to the provisions of the Conservation and Safety Regulations of the City's *Zoning Ordinance*.

NR-4.1. The City shall support the maintenance and improvement of surface and ground water quality.

Responsibility: Planning Department;  
City Council

NR-4.2. The City shall support the maintenance and improvement of water quality in the Napa River.

Time Frame: FY 02-04

NR-4.3. The City shall support the monitoring and assessment of the effects of dredging in the Napa River.

NR-1.C The City shall develop guidelines and regulations to allow new development to enhance and/or create off-site habitat on public or private land if the new development causes the degradation or removal of significant on-site habitat.

Responsibility: Planning Department

Time Frame: FY 02-04

NR-1.D The City shall investigate the possibility of an ordinance to establish a maximum watercraft speed to protect against bank erosion from wakes, and shall develop informational/instructional signage for watercraft users.

## Chapter 8: Health and Safety

- HS-3.1. The City shall continue to provide for floodplain management to protect its residents and property from the hazards of development in the floodplain of the Napa River and its tributaries.
- HS-3.2. The City shall continue to apply flood plain management regulations for development in the floodplain and floodway.
- HS-3.3. The City shall continue to participate in the Federal Emergency Management Agency's flood insurance program.
- HS-3.4. The City shall continue to utilize the Federal Emergency Management Agency's Flood Insurance Rate Map to define the flood hazard area, the floodway and the floodplain.
- HS-3.5. The City shall balance the housing needs of its residents against the risk from potential flood-related hazards.
- HS-3.6. The City shall support programs and methods to reduce the flooding of the Napa River and its tributaries.
- HS-3.7. The City shall promote and assist the Army Corps of Engineers, Napa County, other responsible agencies, and the public to obtain funding and develop a Napa River Flood Control Project if found to entail an acceptable environmental and financial cost.
- HS-3.8. The City shall cooperate with Napa County to establish a reliable funding source for the local share of flood control costs.
- HS-3.9. If flood control is found to be infeasible, or if a flood control project is not underway or funded by the year 2000, the City shall evaluate alternative means of addressing flooding that will allow development in areas currently constrained by floodplain, Flood Evacuation Area, or Floodway designations. Options to be considered shall include, but are not limited to, the following:
- a. Modification of the Flood Evacuation Area standards to permit residential development under certain conditions providing that programs are in place to adequately address life and safety issues.
  - b. Direct and indirect assistance to property owners (through the redevelopment agency, fee waivers).
  - c. Preparation of a more limited flood control plan to reduce the impact of flooding and allow development within parts of the flood area.
  - d. Consideration of alternative development standards which would allow future developers to recoup higher site preparation and development costs.
  - e. Incorporation of evacuation measures into the City's Standardized Emergency Management System, with public education/notification programs, and an "early warning" system similar to a civil defense siren system.
  - f. Special construction and/or site design to adequately protect the safety of future residents.
- HS-8.6. The City shall review and revise its evacuation routes periodically and make provisions for early removal of debris deposited by flood and inundation events in prioritized areas near critical and essential facilities.





# Friends of the Napa River

3.

The Landmarks Building  
1026 First Street • Napa, CA 94559  
Phone (707) 255-8646 • Fax (707) 255-2164

10/18/96

John Yost  
Planning Director  
City of Napa Planning Department

RE: Planning Commission hearing 10-17-96

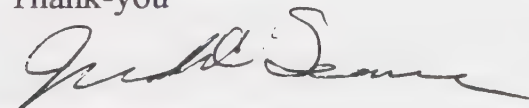
Dear Mr. Yost

These "guidelines" were mistakenly left out of the packet at the hearing last night, please include them.

3.1

Friends of the Napa River were very disappointed that the DEIR for the General Plan was not going to be heard until after 10 or 11 P.M. last night. A matter of such importance should be given more time especially since the study sessions don't allow for public comment.

Thank-you



Judith Sears

# Friends of the Napa River

For Release April 12, 1996:

The Landmarks Building  
1026 First Street • Napa, CA 94559  
Phone (707) 255-8646 • Fax (707) 255-2164

## INTERIM GUIDELINES FOR THE CITY OF NAPA'S URBAN RIVERFRONT

These interim guidelines are a work-in-progress prepared in response to urgent community need. They are a set of guiding principles, voluntary and advisory for now, for everyone, public and private, involved in the development and restoration of Napa's urban riverfront. They are an attempt to forge a cohesive articulation of the vision, growing for several decades, of restoring Napa's scarred river to vibrant health and returning Napa's downtown waterfront to the hub of dynamic activity it was -- the heart of a revitalized river district which will bring huge economic, cultural, and recreational benefits to the entire Napa Valley as well as to visitors. As planning for the first exciting projects (Center for Wine Food and the Arts, Hatt Marketplace, Noyes Lumber site) moves ahead, as a sensitive and beautiful flood control project emerges, as downtown improvement initiatives proliferate, we need a common language for the urban riverfront *now*. *Successful river cities have guidelines.*

The design and development professionals and urban river stakeholders who contributed to these guidelines drew on a rich legacy of ideas: the Roma and Sasaki plans, the City's River Trail, Renaissance Napa, and myriad community efforts. It drew on the experience of many other river cities, from San Antonio to Portland, which have already learned the potent power of a river as a revitalizing force. We have the potential to be the national model for urban rivers, but we must do it right. These guidelines are a starting point, to be further developed to a professional level, then adopted by the City Council, and integrated into an urgently-needed specific plan for the downtown river district and into the new General Plan. These principles will, we hope, be embraced by the community, by landowners/developers along the river, and in public policy, zoning, and development standards. Emerging in tandem with the community's alternate flood management plan, they will, we hope, encourage wonderful, quality projects along the river.

We urge the City to encourage and expedite projects sensitive to these guidelines, and to discourage projects that are not. The guidelines apply with or without flood control. Like the living river, this is a living document; comments are welcomed.

\* \* \* \* \*

Contributors: Moira Johnston Block - Guidelines Chair, Juliana Inman, Karen Rippey, Dorothy Lind, John Whitridge, Vince DeDomenico, Mike McKaig, Barbara Stafford, Harry Price, Bill Bylund, Chuck Shinnamon, Liesel Eisele, Farnum Kerr, Dick Williams, Philip Vandetoolen, John Clifton, Tony Norris.



## **GUIDELINES FOR CITY OF NAPA'S URBAN RIVERFRONT:**

The goal of these guidelines is to guide the community to achieve a unique urban riverfront which: 1) will be a festive, vibrant, and compellingly attractive locus for public gathering which reflects the spirit and nature of Napa Valley, 2) maintains and restores the Napa River as a healthy, living river, and captures the magic and beauty of the river, and 3) brings, as a by-product of those two goals, broad-ranging and enduring social and economic benefits to our entire Napa Valley community.

### **General Character:**

: The urban riverfront is defined, here, as from the north end of the Oxbow to south of the Hatt Building, with the lower reach of Napa Creek and a proposed bypass included.

: The health and biological diversity of "the living river" must be consistently maintained as the river co-exists with the human community along its banks.

: The urban riverfront should be a lively, festive, and attractive public gathering place for cultural, commercial, and recreational uses that reflects the friendly, historic, 'village' quality and scale of our city and riverfront. All architectural, landscaping, and design elements should enhance and support that.

: All projects should be oriented towards the river, acknowledging and enhancing both the river and Napa Creek. The river is not the back door. The river 'door' should receive equal or greater design attention than the street 'door.' Service and utility uses should be avoided on the riverfront.

: Linkages are vital, creating connections between the riverfront , the waterway, and the surrounding community. Linkages are important, too, in achieving the vision of a multi-mode transportation system of linked river ferries, an extended train system, shuttle buses to upvalley, and a network of pedestrian pathways which would benefit the entire Napa Valley by reducing automobile use in this fragile agricultural valley.

: Buildings: Architecture and building materials should be reflective of and sympathetic to the several historical architectural styles and structural forms of the Napa Valley. The imposition of a single building theme or style along the entire length of the waterfront is not recommended; rather, the design of new development should be scaled and detailed in a way that complements the historic character and role of Napa's riverfront, without resorting to contrived or overly thematic approaches that could soon become outdated. This does not exclude fine contemporary architecture, if 'spirit', landscaping, and materials are compatible with neighboring riverfront and habitat integrity.

: The River Corridor and the continuous River Trail are the unifying features of the urban riverfront, a unity which should be achieved by the cohesive 'look' and flavor, the aesthetic spirit, of the riverbank, trails, decks and promenades and by a consistency of materials and design (in common elements such as surface, lighting, trail "furniture", guard rails, trees and plantings). The Trail through the urban riverfront would connect people to the more pastoral river trail to the north and south which would offer a variety of recreational experiences -- wetlands, sports fields, fishing sites, equestrian paths, for example.

: This is a pedestrian area, requiring a critical mass of people to be successful. Development designed to the criteria and in the spirit of the 'urban riverfront' should be concentrated within its defined boundaries and not be permitted to sprawl and leapfrog beyond them, as it would do three negative things: create a 'commercial strip' not unlike the faceless, town-destroying automobile strips of America; dilute the needed concentration of pedestrian traffic; and 'eat' into the green belt open space which must also be developed and preserved along the river. These goals must be achieved and controlled through zoning and the General Plan.

: Open space. A percentage of each project should be devoted to open space -- spaces which invite a meandering flow and clustering of pedestrian traffic, with visual surprises, seating areas, river vistas, focal 'gathering spots' (fountains, sculptures, etc.), shade trees, cafe decks, flower baskets, banners, color in flowers and plantings, etc.

### **Specific Guidelines for Use and Design:**

(These can only be preliminary approximations until the flood control design is complete, and until a more rigorous, detailed and professional set of development criteria can be prepared with guidance of City staff)

: All structures and improvements should be designed, sited, constructed and maintained to anticipate that flooding *can* occur with or without the 100-year flood protection which is the goal (the 101-year event happens!). Inexpensive flood-proofing and floodable ground floors, plazas, and landscaping should be incorporated.

: Access: The community must have access, both physical and visual, to the river and River Trail through buildings, corridors, arcades, and walkways from street. Access pathways should be treated as elements of the riverfront, with landscaping and attractive and inviting architectural treatment. There must be pedestrian linkages to the surrounding neighborhood -- to downtown, the Center, the Wine Train, Expo, etc., perhaps including a pedestrian bridge over the river at some point. Bicycles and boats could be part of the 'people moving' system; in Seattle, city-owned bikes are available on the street, free, for anyone to use. Fences should not block access and should be subject to the same general design criteria as buildings.

: Safety and maintenance should be, primarily, the responsibility of owners and tenants, and provisions for both must be built into design of buildings and landscaping to assure an ongoing quality experience. Public access and easements may also require City involvement in control, maintenance, and enforcement policies. For example, the River Trail, which will probably be defined by a public easement, may well be a City responsibility. Since private



owners are encouraged to give public access to the river and River Trail, a public/private partnership for safety and maintenance makes sense.

: Signage, lighting, and sound: Should be sensitive to and reflect the nature of our charming, historic, small town riverfront. Commercial name-brand neon signs should be controlled. Amplified sound should be controlled by decibel standards.

: Setbacks: A complex and controversial issue which cannot be rigidly fixed at this time, but which must, 1) be integrated into the emerging flood management design and, 2) reflect the best current materials, design technology, and biological standards for a built environment which will protect the living river and respect natural river dynamics (point bars, bankfull state, erosion, etc). In some areas, sloped and widened banks, and substantial setbacks may be the solution; in those few, short reaches where the banks have already been severely modified and impaired and where 'hardscape' may be required, it may be river-friendly floodwalls, cantilevering and even piles. Setbacks should accommodate River Trail, decks and promenades. A range of setbacks is possible, given current techniques for bank treatments that protect habitat, contain erosion, preserve water quality, and respect the river's hydrology. The setback for each project will have to be carefully evaluated for river health and compatibility with neighboring projects. Setbacks that create varied experiences along the river (plazas, courts, stepped levels, stairs to river) are encouraged.

: Quality, sensitivity, and compatibility are the bywords for buildings.

: Historic restorations should be done with integrity and authenticity. Refer to: Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings.

: In single-use projects such as hotels or larger restaurants, monolithic walls and facades are to be avoided. Encourage pedestrian access with visual interest, flow and ambience into and through structures.

: Materials reflecting Napa's traditions should be encouraged -- *real* stone, brick, wood, etc. Discourage large expanses of glass, especially reflective glass, and overuse of concrete, for example.

: Development Massing: New development should preserve the rhythm and scale of the historic existing buildings and of nearby Main Street. Density should be varied, with clustered commercial next to open river vistas.

: Uses: Diverse multi-use is envisioned for the urban riverfront. The current Tourist/Commercial land use designation is scheduled to be changed to Mixed Use in the City's new General Plan. Appropriate uses are those compatible with a variety of tourist/commercial/retail/cultural/ residential/social/ recreational purposes of both visitors and residents, tourists and Napers, of all ages.

: Residential living space 'above the store' should be encouraged as part of the dynamic mix of uses perceived for developments. Young working couples, retired, and seasonal residents would bring year-round, round-the-clock vitality to the riverfront district.

: Cultural uses should be encouraged. The presence of the American Center for Wine, Food and the Arts, Jarvis Conservatory, Opera House, Main Street galleries, and annual River Festival with the Napa Symphony create a cultural nexus which could be expanded, for example, with a riverside amphitheatre (Veterans Park is one suggested site), public sculpture, street performers, artists studios, art galleries, open-air concerts, more well-done historic wall murals. The City might establish a "cultural arts district" overlaying the riverfront district, as Eureka has done.

: Retail shops should be of an intimate, quality nature appropriate to a world center of wine, food and good living and yet offer some 'real life' services that will make it attractive to Napa's families as well as to tourists. An indoor, year-round farmer's market would be an excellent element (Vancouver, B.C.'s Granville Island and Seattle's Pike Marketplace are successful examples). Restaurants and cafes of high quality and diversity are encouraged.

: Examples of inappropriate uses: Fast food chains, convenience stores (7-11s), single-use office or institutional buildings, industrial uses, low-end factory outlets.

: Banks and Landscaping. Although the short urban reach of the river will, with flood control, be somewhat modified from its natural state and configuration, all efforts should be made in landscaping to restore and enhance the natural living quality of the river's edge through native plants endemic to the Napa River, and wildlife and fish habitats. This will give continuity to the river corridor and ensure a healthy riparian environment; optimally, a continuous necklace of reeds and other emergent plants at the water's edge protects fish from predators. This is an urban river, however, and landscaping of buildings and plazas need not fully recreate a natural riverbank. In those short reaches where a hard edge cannot be avoided, innovative, more natural solutions should be utilized for bank stabilization. Displays of color are appropriate, particularly at key entry points to the river corridor and at linkage points to other greenways. Exotic plant material that is documented as being invasive, allelopathic or otherwise overly competitive shall be excluded from the landscape. Sites shall be protected from erosion during construction, and existing trees protected, where appropriate. Topsoil native to the site shall be used in landscaped areas, if possible. Proper drainage must be designed.

: Parking: Parking lots should not front on the river. If possible, no surface or stacked parking should be on the river-side of Soscol or Main Street. Well-designed parking structures which blend into the river district may have to be built a block or two back from the riverfront. Where parking can be accommodated on site, it should be basement or depressed parking, where feasible. The City should be encouraged to work with developers to find off-site parking locations, and Redevelopment might assist the first developers with financing.

: Use the river as a waterway, building small docks (floating, or best technology available) for small shuttle boats and private boats, where possible, to make the river a dynamic link in the transportation system as it was historically. The concept of 'coming to lunch by water' should be integral to the concept of the riverfront. San Antonio's very popular use of small pontoon boats to shuttle people to several designated stops along the River Walk could be adapted to



the Napa River. There is much enthusiasm for a ferry service from San Francisco and/or other points on the Bay. Because of the hours it takes to motor by boat to downtown Napa, facilities should invite it being a boater's destination for an overnight stay. At least one small 'safe harbor', perhaps at the site of the historic wharf south of the Hatt Building, is encouraged. No-wake speeds and engine noise on the river will be strictly controlled north of Kennedy Park.

: Maximum height for riverfront structures: 3 floors or 45 feet. No more than two floors on river-facing facade. Step backs required for buildings taller than two stories. Consideration will be given to special architectural elements which may exceed 45 feet, on a case-by-case design quality basis. These standards should be reevaluated when the final flood control design is complete.

: Water runoff: Runoff from new development should be impounded and released at a rate of discharge equal to the rate of discharge from the undisturbed site. Use the most practical, technologically-best solution for controlling runoff flows.

: New bridges should be beautifully designed, reflect the valley's famous traditional bridges, and have open views of the river through railings. Because of the visual prominence of bridges in the riverfront project, bridge design competitions are encouraged.

: Projects must accomodate maintenance activities appropriate for an urban/riparian interface environment.

: Absent any formal evaluation mechanism at this time, project evaluation could be done by an ad hoc Urban Riverfront Project Evaluation committee of competent professionals, in addition to City staff and the Planning Commission.

**Welcome Back to the River!**





# Chamber of Commerce

GENERAL PLAN  
COMMUNICATION #4

October 15, 1996

Mayor Brad Wagenknecht  
City Council  
City Hall  
Napa, California

RE: Napa City General Plan

Dear Brad,

The Legislative Review Committee and the Executive Committee of the Napa Chamber has stated its position on the General Plan of the City of Napa in the attached letter.

We feel very strongly that we must get a commitment from the City for developing the Economic Element for the General Plan immediately. That does not mean that we insist that the General Plan be held up, but that the resolution and budget commitment be made prior to the approval of the General Plan.

This is an opportunity for the private and public sectors to work together on a mutually beneficial issue and I can assure you that the Napa Chamber is fully committed to work with the City to develop the Economic Element. We see the Economic Element much like a business sees a business plan in that it justifies the "want list" with reality (funding); and, we feel certain that the addition of an Economic Element will answer many questions which are presently unanswered by the General Plan.

We hope that ultimately as the Plan goes through the approval process that our wishes will be considered and be realized. As such, we stand ready to serve in what ever capacity it takes to bring about the Economic Element.

Sincerely,

Charles B. Bogue  
President

RECEIVED

OCT 18 1996

City Clerk's Office



4.1



(Reference to General Plan  
communication #1 )





Louise Clerici  
4032 Wisteria Way  
Napa, CA 94558  
October 28, 1996

5.

Mr. John Yost, Planning Director  
Planning Department  
P.O. Box 660  
Napa, CA 94559



GENERAL PLAN COMMUNICATION #5

Dear Mr. Yost:

I'm writing this letter in response to the October 1, 1996 Draft Environmental Impact Report prepared by Ogden Environmental & Energy Services Company for the City of Napa General Plan (SCH #95-03-3060).

My comments are as follows:

1. STATEMENT

Page S-12 Water Supply #3 "Development accommodated by the Draft General Plan would not result in demand in excess of the City of Napa's water supply system." The level of significance after mitigation was described as "insignificant".

Page 176 - Draft Environmental Impact Report for the Big Ranch Specific Plan dated March 1996 "Significance after Mitigation" - "Implementation of Mitigation Measure 4.9-1 would reduce cumulative water distribution impacts to a less-than-significant impact. Implementation of Mitigation Measure 4.9-2 could reduce cumulative water service impacts. However, until firm water sources are found, this would remain a significant unavoidable impact."

5.1

Comment:

Which Environmental Impact Report gives an accurate analysis of our current and future water supply, and why?

2. STATEMENT

Page S-13 Wastewater Treatment, Storage, and Disposal - Line 4 "policies and implementation programs contained in the General Plan and implementation of improvements suggested in the NSD's 1990 Wastewater Master Plan would ensure that adequate wastewater treatment, storage and disposal facilities are available." The Level of significance after mitigation was described as "insignificant".

Page 184 - Draft Environmental Impact Report for the Big Ranch Specific Plan dated March 1996 - "Soscol Treatment Plant Capacity" - "According to the NSD, there may not be sufficient capacity at Soscol Treatment Plant for buildout of the BRSPA combined with other development projects in the District. As described above, NSD Master Plan improvements would provide adequate capacity until the year 2012. However, this plan currently is being reconsidered. Until this issue is resolved, the NSD does not know the future capacity of the Soscol Treatment Plant. This would be a potentially significant impact."

5.1

Comment:

Which Environmental Impact Report gives an accurate analysis of our current and future wastewater treatment plant capacity, and why?

## 3. STATEMENT

Figure 2-2 Project Area and Rural Urban Limit - The legend identifies the Parcels located outside of Sphere of Influence and the County Parcels within the RUL.

5.3 Comment:

There are 2 shaded areas that are unidentified in the legend. One is at the corner of Trancas Street and the RUL line and the other is adjacent to the Highway symbol  $\frac{29}{121}$ . Please explain their meaning.

## 4. STATEMENT

Page S-5 First paragraph - "In order to accommodate new development and protect existing neighborhoods, the RUL is proposed to be extended in three locations."

5.4 The three locations are: Area west of Foster Road, Area to the northeast of Big Ranch Road and Trancas Street, Napa State Hospital environs.

Comment:

Who is proposing this?

## 5. STATEMENT

Page 3.6-2 Environmental Analysis - First paragraph, 2nd sentence:

"According to a 1994 survey, there are 858 acres of vacant land, of which only about half (438) is considered generally developable."

5.5 Page 3.9-3 #3 - 2nd sentence:

"Within the RUL, there are approximately 1,037 acres of undeveloped or agricultural land slated for development."

Comment:

Please explain the inconsistency between the 2 figures with respect to the amount of remaining developable land within the RUL? Which figure is correct?

## 6. STATEMENT

Page 3.10-1 Air Quality - Line 7:

"Please refer to Tables NR-1 and NR-2 of Chapter 7, Natural Resources, of the Draft General Plan Background Report for recent data from the Napa air monitoring station and state and federal ambient air quality standards."

5.6 Comment:

Table NR-1 lists "Sensitive Plant and Wildlife Species Known to Occur in the Napa A

The correct table is NR-4 Page 7-31 "Ambient Air Quality Summary Napa Monitoring Station on Jefferson Street."

7. Comment:

5.7 In the future it would be extremely helpful if all pages of reports, such as this, were numbered numerically in sequence rather than numerically in sub-groups. It would be easier to reference an article or tell if pages are missing.

Yours truly,

*Louise Glorici*



## Memorandum

GENERAL PLAN COMMUNICATION #6

To: Glen Newman, Chief  
Coast-Cascade Region

Date: October 14, 1996

R37

Telephone: (916) 653-9416  
CALNET 437-9416

Attention: Environmental Coordinator  
Lake-Napa Ranger Unit

From: Department of Forestry and Fire Protection

Subject: 5300 ENVIRONMENTAL PROTECTION  
Environment Impact Statement

Name: City of Napa General Plan  
County: Napa  
Type: Drift EIR  
SCH #  
DUE DATE:



The above referenced environmental document is attached for your review and comment. Please note the day on which comments are due back to me. If you will be unable to complete your review by that time, please contact me at least seven days before that date so I can request an extension of the review period.

( ) Commented or consulted with local government.

( ) Comments attached.

If you have comments, attach them using DEPARTMENT OF FORESTRY letterhead.

☒ No Comment

If you have NO COMMENT, explain briefly on the lines below or use the back of this form.

Name of Reviewer: *E. L. Wiernman*

Phone: (707) 963-3601

*Dale Wiernman*

Dale L. Wiernman  
Environmental Protection Officer

elc  
Attachment





NAPA VALLEY  
COLLEGE

2 2 7 7  
Napa-Vallejo Hwy.  
Napa, California  
9 4 5 5 8

November 12, 1996

Mr. John Yost  
Planning Director  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559

Dear Mr. Yost:

The purpose of this letter is to comment on the City of Napa Draft General Plan and Draft EIR. Several staff from Napa Valley College have reviewed the documents. We have two comments on Chapter 4 of the Background Report, which includes information on the schools in Napa:

1. The report does not include any charts showing enrollment at Napa Valley College. Enrollment trend reports are available. Please contact me at 253-3371 if you would like to review any of these reports. 7.1
2. Page 4-19 includes enrollment figures for High Schools within the Napa Unified School District. The final entry shows 16 students enrolled in "community college." This is confusing. Does it mean that 16 high school students are enrolled at NVC? Our enrollment reports show that much a higher number of high school students enroll in one or more class at NVC. We suggest that a footnote or other explanation be added to clarify this number. 7.2

Thank you for the opportunity to review the documents.

Sincerely,

*Judie Walter-Burke*

Judie Walter-Burke  
Director, Planning and  
Resource Development







METROPOLITAN  
TRANSPORTATION  
COMMISSION

Joseph P. Bort MetroCenter  
101 Eighth Street  
Oakland, CA 94607-4700  
Tel.: 510.464.7700  
TTY/TDD: 510.464.7769  
Fax: 510.464.7848  
e-mail: info@mtc.dst.ca.us

8.

November 14, 1996

GENERAL PLAN COMMUNICATION #8



Deborah Faaborg  
General Plan Project Manager  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559

Re: City of Napa General Plan Update EIR

Dear Ms. Faaborg:

This letter contains Metropolitan Transportation Commission (MTC) staff comments on the transportation system impact analysis included in the EIR for the City of Napa General Plan Update. The proposed general plan would guide future development in the City of Napa through 2020. The plan includes a buildout population and employment potential of 11,500 new residents, 7,840 new residential units and 14,000 new jobs.

A portion of the traffic generated by development in the City of Napa is likely to have origins and destinations outside the city limits. The draft EIR does not analyze the traffic impacts of the Plan on roads outside of the city. Consequently, please determine whether and to what levels there would be impacts on Route 29 to the north and south of the Napa city limits, documenting trip distribution and assumptions.

8.1

Thank you for the opportunity to comment on the City of Napa General Plan and EIR. If we can be of any assistance, please do not hesitate to call.

Sincerely,

Michelle Morris Brubaker  
Transportation Planner

cc: Craig Goldblatt, MTC  
ABAG Clearinghouse  
Commissioner Negri  
Commissioner McKenna  
Irwin Mussen, BAAQMD

Dianne McKenna, Chair  
Association of Bay Area Governments

James Spering, Vice Chair  
Solano County and Cities

Keith Axtell  
U.S. Department of Housing  
and Urban Development

Jane Baker  
Cities of San Mateo County

James T. Beall Jr.  
Santa Clara County

Sharon Brown  
Cities of Contra Costa County

Joe Browne  
State Business, Transportation  
and Housing Agency

Edward R. Campbell  
Alameda County

Dorene M. Giacomini  
U.S. Department of Transportation

Mary Griffin  
San Mateo County

Elibu Harris  
Cities of Alameda County

Tom Hsieh  
City and County of San Francisco

Jean McCown  
Cities of Santa Clara County

Fred Negri  
Napa County and Cities

Jon Rubin  
San Francisco Mayor's Appointee

Angelo J. Siracusa  
San Francisco Bay Conservation  
and Development Commission

Tom Torlakson  
Contra Costa County

Doug Wilson  
Marin County and Cities

Sharon Wright  
Sonoma County and Cities

Lawrence D. Dahms  
Executive Director

William F. Hein  
Deputy Executive Director







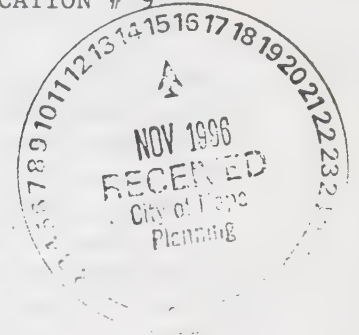
Dedicated to Preserving the Napa River for Generations to Come

950 IMOLA AVENUE WEST  
P. O. BOX 2480  
NAPA, CALIFORNIA 94558-0522  
TELEPHONE (707) 258-6000  
FAX (707) 258-6048

GENERAL PLAN COMMUNICATION # 9

November 14, 1996

Deborah Faaborg, General Plan Project Manager  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559



Re: City of Napa Draft General Plan and Draft EIR

Dear Deborah:

The Napa Sanitation District has reviewed the draft copy of the aforementioned document which includes a Background Report, Policy Document and Draft EIR. The District has the following comments relative to sanitary sewer and reclaimed water issues:

Background Report:

1. On page 4-30 under "History of Utility", sentence two of paragraph two should read - "The City of Napa Napa Sanitation District and the then.....".
2. On page 4-30 under "Wastewater Collection and Treatment System", paragraph one, sentence two should read - "The Imola Plant has a daily capacity primary treatment capacity of 8.0 million gallons per day. and uses a primary treatment process." After sentence three add the sentence - "In 1990, NSD began using the biofilters again during the winter months due to excess loading at the Soscol Plant." Sentence four should read - "The Soscol Plant maintained by NSD for the NACWMA has a hydraulic capacity of 15.4 million gallons per day." with 1.54 million gallons per day of oxidation pond capacity reserved for American Canyon's Wastewater.
3. On page 4-33, sentence four of paragraph one which reads "Pasture irrigation and the use of the District's oxidation ponds for summer effluent storage has also helped the NSD reduce its wastewater treatment cost." should be stricken.
4. On page 4-33, paragraph three, sentence two should read - "Many of the sanitary sewer.....through faulty sewer lines and any illegal connections (infiltration and inflow, or I/I)." Sentence three should read - "This extra water can swell the amount of wastewater requiring treatment at the Imola Soscol Plant by as much as 700 percent."

5. On page 4-33, paragraph four, sentence five should read - "Some of these areas may be limited in the amount of development that will be allowed to occur until necessary upgrades to the downstream collection and treatment systems are completed."

9.1 6. On page 4-33, paragraph five, sentence two should read - "Slip lining involves pulling or pushing a ~~high density polyethylene~~ pipe liner into an existing sewer pipe. Sentence four should read - "~~Although less costly than replacement,~~ Rehabilitation of the three basins....." Sentence six which reads - "To date, 25 percent of NSD's sewers have been slip lined." should be stricken.

7. On page 4-33, paragraph six, sentence one should note that NSD is now providing rebates for toilets that use from 3.5 to 7 gallons per flush that are replaced with 1.6 gallon models.

8. On page 4-34, the last sentence of the first full paragraph should read - "Also, the total number..... which is less than the NSD estimate of ~~8,750 new residential service connections in this time frame~~ 8,400 equivalent dwelling units, of which approximately 6,100 would be residential units."

Draft Policy Document:

9.2 9. On page 4-11 under "Policies" - CS-9.3 should be revised to say - "The City shall use, or allow to be used, reclaimed water where feasible."

9.3 10. On page 4-12 under "Wastewater - Treatment Facilities", sentence three of paragraph one should read - "The Soscol Plant has a ~~design~~ hydraulic capacity of 15.4 million gallons per day. ~~with 1.54 million gallons per day of oxidation pond capacity presently reserved for American Canyon's wastewater.~~" Sentence three of paragraph two should read - "The plan also includes expenditures of \$13 million for trunk lines and \$2 million for ~~relief pumping stations~~ pump station expansion."

9.4 11. On page 4-12 under "Sludge Disposal and Water Reclamation", the first paragraph should be stricken and replaced with the following paragraph - "Dewatered sludge generated at the NSD's Imola Plant is either beneficially reused or disposed of at various landfill sites. Most of the sludge generated at the Soscol facility since 1966 has been stored in the plant's oxidation ponds. The District's Master Plan calls for removal of the accumulated sludge and future processing of sludge as it is generated." The last sentence of paragraph two should read - "From May through October, when discharge to the river is prohibited, ~~reclaimed water is used for irrigation~~ wastewater is stored in the



District's oxidation ponds for winter discharge, with a portion being reclaimed for irrigation. The first sentence in paragraph three should read - "Although water reclamation is not ~~always~~ cost effective,....."

12. On page 4-13, the last sentence in the first full paragraph should read - "The Stanly Ranch property ~~could also consider using reclaimed wastewater~~ will be required to use reclaimed water for landscape irrigation."

9.5

#### Draft Environmental Impact Report:

13. On page S-12 under "Water Supply" the second mitigation measure should be revised to say - "Use, or allow to be used, reclaimed water where feasible. (CS-9.3)"

9.6

14. On page S-13 under "Wastewater Treatment, Storage, and Disposal" the level of significance under "Impacts" and "Level of Significance After Mitigation" should both be (S) - Significant.

9.7

15. On page 3.4-3, sentences two and four of paragraph one should be revised as stated in point 2 on page one of this letter. Also, sentence four of paragraph two beginning with "Pasture irrigation and the use....." should be stricken.

9.8

16. On page 3.4-4 under "Wastewater Treatment, Storage and Disposal" the existing statement should be deleted and replaced with - "Additional development will pose a significant impact on wastewater collection, treatment, and disposal, which impacts must be mitigated by constructing new, or rehabilitating existing, collection and treatment facilities, requiring indoor water conservation, and by expanding the water reclamation program."

9.9

17. On page 3.4-7 under "Wastewater Treatment, Storage, and Disposal" the end of paragraph one should note the impact of development accommodated by the Draft General Plan on NSD's facilities is (S) - Significant. The third sentence in paragraph two should read - "These problems have been addressed as part of the Soscol Plant ~~phase II~~ improvements ....." And, in paragraph four, sentences three and four beginning with "Because the NSD is implementing improvements....." should be deleted and replaced with - "NSD must continue with appropriate construction of proposed improvements, and monitoring and planning for the possible need for plant expansion, to mitigate the impact of development proposed in the General Plan."

9.10

18. On page 3.12-1 under "Hazardous Materials Storage, Usage, and Disposal in the City of Napa", sentence two of paragraph two needs to be deleted due to the fact the statement is no longer valid. Contact the Napa County

9.11



Department of Environmental Management for verification.

General comments on all documents:

9.12 19. The General Plan and Draft EIR need to note that Phase I of the treatment plant upgrade is nearing completion. This project involves construction of facilities that will allow the quality of water that the District produces for reclamation to be upgraded from Title 22 restricted use to unrestricted use, but does not increase the treatment capacity at the plant. In order for additional capacity to be available at the plant, subsequent plant upgrade projects will need to be constructed. Phase 2, which will increase the capacity of the plant in order to provide service to developments that are authorized by the City and County of Napa's General Plans, and are within the District's service area, is in the preliminary design stages and is currently being contemplated for approval by the District's Board. However, until the major improvements recommended in the Master Plan are completed, the District cannot guarantee that capacity will be available for future growth.

9.13 20. The General Plan and Draft EIR need to provide projections on the anticipated wastewater flow that will be generated as a result of development authorized by the General Plan. The calculations need to include storm water inflow and infiltration, as well as commensurate commercial and industrial growth. Additionally, the EIR needs to review what other development is likely to occur within NSD's boundaries or its Sphere of Influence that is outside of the scope of this General Plan. This would include development of the Napa Airport Industrial Area and the Silverado Country Club, portions of which are within the District's Boundaries and/or Sphere of Influence, and that the District will be called upon to serve.

9.14 21. At various places throughout the General Plan and EIR, it is noted that the Soscol Treatment Plant has a capacity of 15.4 million gallons per day. It needs to be noted that this is the nominal hydraulic capacity of the plant in its existing configuration, and that even though non wet weather flows are approximately 8 million gallons a day, the biological capacity is currently being exceeded during certain times of the year. This is evidenced by periodic odors emanating from the ponds and consistently low dissolved oxygen readings in the ponds. The existing system is at capacity. The contemplated Phase 2 project will add growth capacity for up to 10 years.

Additionally, as is noted in the documents, the District cannot discharge to the Napa River during the dry weather months of May thru October. This requires the District to use the ponds for storage during this period. Due to the fact that in recent years the ponds have reached their

9.14 ↑  
storage limits, additional reclamation area will be required to directly offset the volume of waste per day that will be generated within the General Plan area. The City of Napa must be responsible for assisting the District in finding additional reclamation area.

22. In the General Plan, reference is made to the fact that the City of American Canyon may build their own treatment plant or ship their wastewater to Vallejo for treatment, which would result in them disconnecting from the District's Soscol Plant. It should be clearly noted that the City of American Canyon, at their discretion, has the option of remaining connected to the Soscol Treatment Plant upon purchasing the capacity they are utilizing in the treatment plant from the District. If the City of American Canyon chooses to remain connected to the District's facilities, additional upgrades to the Soscol Treatment Plant, beyond Phase 2 as outlined above, would be required. The cost of the required upgrades would be paid for with the fees collected from the City of American Canyon. It should be noted that the City Council of American Canyon has voted to disconnect from the District. However, the District has not received written notice from American Canyon of their intention to disconnect.

9.15

Furthermore, even if the City of American Canyon pursues wastewater treatment elsewhere, their disconnection from the District's treatment facilities will not substantially reduce the loading on the ponds. During critical times, their departure would reduce the loading on the ponds from 200% of capacity to 180% of capacity. The District's Master Plan projects must proceed to accommodate available capacity for future development within the General Plan area.

If you have any questions regarding these matters, or need any additional information, please feel free to contact me.

Sincerely,

John W. Stewart  
Engineer-Manager

by:   
Todd Herrick  
Engineering Technician

cc: NSD Board of Directors  
L. Randolph Skidmore, Legal Counsel  
Jeff Redding, County Planning





C  
M  
A

LaVerne Oyarzo  
Chair

NAPA COUNTY  
CONGESTION MANAGEMENT AGENCY

1195 Third Street Room 201, Napa, California 94559  
Phone (707) 253-4351 Fax (707) 253-4627

GENERAL PLAN COMMUNICATION # 10

November 18, 1996

Deborah Faaborg  
General Plan Project Manager  
City of Napa Planning Department  
P.O. Box 660  
Napa, California 94559  
FAX Transmitted to: 707.257.9522



Ms. Faaborg:

We have received and examined the draft General Plan documents for the City of Napa and have the following comments.

*General Plan Draft Policy Document*

1) Page 1-6, Table 1-2. Is the land-use shown in the Table what was used in the traffic modeling analysis? The document does not specify the land use scenario used in the traffic projection model.

10.1

2) Page 1-8, LU-1.6. The City designates several State Highway routes as scenic corridors. The City might wish to include in the requirements for these locations sufficient strictures to add them to the state Scenic Highways list.

10.2

3) Page 1-15, LU-4.C. In this and several other locations (T-1.8, T-1.B, T-1.C, and T-4.B for examples), the City either is investigating the imposition of new fees or outright calling for new fees or assessments. Considering the passage of Proposition 218, it might behoove the City to re-examine these.

10.3

4) Page 3-1, Introduction. The City should be complimented on this Introduction that clearly recognizes the mobility problems that all jurisdictions are facing. The impacts of decreasing mobility due to congestion and lack of operating and maintenance moneys are crucial to the livability of the state over the next several decades.

10.4

5) Figure 3-1. Please consider showing the remainder of Trancas and the portion of Silverado not on the State Route. Without these additions, the graphic is strangely incomplete and may be confusing.

10.5

6) Page 3-7, Table 3-3. State Route 29 is presently rated as a freeway by Caltrans from north of the intersection of 29/12/121 to one-quarter mile north of Lincoln. With the construction of the 29/Trancas

10.6

- 10.6 interchange, the designation will move to north of Trancas, but short of Trower. The freeway section will not move south of the 121/12/29 intersection to north of the 221/29 intersection as the Table states.
- It is noteworthy that the City will have no major arterial servicing north-south movements west of SR 29.
- 10.7 7) Page 3-9, T-1.2. The city should be complimented for its willingness to assess projects for their impacts on the regional transportation system. Unfortunately the analysis of the impacts of growth in the City does not, in this document, extend but very little past the City's RUL. Without a more broad-ranging analysis, the actual full impact of the proposed GP are not possible to assess.
- 10.8 8) Page 3-11, Implementation Programs. Not all the projects shown in the environmental document on page 3.3-6 as included in the modeling effort in the "2020 with Roadway Improvements" are shown in the Implementation Program for the various routes. Please consider adding the missing projects. The "2020 with Roadway Improvements" indicate at least one project outside of the City. Does the City intend to contribute? How will the City insure that the project is completed?
- 10.9 9) Page 3-13, T-2.1. The Policy does not appear to speak to standards on the state system, but obviously exempts one state/local intersection from the standards. Does this imply that the standards apply to all such mixed intersections as well? Please consider clearly applying the same standard to the state routes in the City as this policy applies to the local streets.
- 10.10 10) Page 3-13, T-2.3. This Policy seems to state that both the intersections and the roadway segments connecting them should be examined for the levels of service when assessing the operation of the City's roadways. While the CMA certainly believes that this is the correct method for any assessment, the City's analysis of its own General Plan relies entirely on an examination and report of intersection LOS. The City's analysis should also examine the interconnecting segments.
- 10.11 11) Page 3-14, Crucial Corridors. Please consider segmenting the requirements for the Corridors to match with the Policy T-2.1 that lowers the standards of selected segments of some of the crucial corridors. It seems unlikely that the Policies for the Crucial Corridors should be the same in places where the City is acknowledging its inability to maintain a level of service that it desires as for locations where the standards can be maintained.
- 10.12 12) Page 3-14, Trancas Street. Please consider extending the limit of this corridor to Silverado (121).
- 10.13 13) Page 3-15, T-3.3 (c) (ii) and T-3.4 (b) (iii). Both of these and several others in this Corridor section state a requirement for more than minimum parking. We suggest that it should be rewritten to increase parking requirements in these locations to such a level that no project will need parking outside of the site at any time, or perhaps there will be no overflow parking required outside the site for all but a certain small percentage of the time.
- 0.14 14) Page 3-18, T-4A. Although the City overtly recognizes the problems that traffic calming has caused some jurisdictions (like Berkeley), it is nevertheless proposing to draft standards for such actions. We would submit that a well designed, multiply redundant street system backed by good traffic enforcement is the best traffic calming method available. Traffic calming standards can lead to an overall degradation in service, as the section acknowledges.



15) Page 3-19, T-5.5 We would like to compliment the City on the determination to explore transit consolidation as a possible benefit to the riding public.

10.15

Page 3-20, T-5.12 and T-5.13. These seem to constitute TDM measures. We would encourage the City to remove the conditional phraseology in both of these policies and to add an implementation program for these TDM measures to be included in City regulations.

16) Page 3-21, second paragraph, last line. The CMA Board adopted the Countywide Bicycle Plan on October 16, 1996.

10.16

17) Page 3-24, T-6.D and T-6.F. Please consider shortening the implementation time for both of these actions. The City currently has access to TDA Article 3 funds, approved for the 1995-96 FY, for both of these projects.

10.17

### *Background Report*

1) Page 1-21, Scenic Corridors. As the City has designated SR 29 a Scenic Highway, perhaps the City would wish to take the necessary actions to have the state officially adopt the designation as well.

10.18

2) Page 1-29, Congestion Management Program. The CMP will not be a legislative requirement as of 1/1/97.

The CMA traffic projection model may have been used as a base for the traffic analyses completed by the City. However, the CMA has a policy that recognizes if the model is used for purposes other than an analysis conducted by the CMA or for the analysis of a project under the requirements of the CMP, that the model is not under their control and cannot be said to be the CMA model.

10.19

In addition, it is our belief, by the information presented in the Plan, that the LU utilized in the GP analysis is significantly different from the current 2020 data for the CMA. The housing units in the CMA database is 37,390, for example, while the City reports less on Table LU-3 for 2020. The model used for the analysis should not be purported to be the CMP model, as it is not identical in the LU and perhaps other particulars as well. Please remove the last line of the page as it appears to be incorrect.

3) Page 1-34, Table LU-3. Please clearly label the 2020 figures as projections from the City of Napa Planning Department. ABAG did not in Projections '94 or '96, go out to 2020. The Table now implies that the information is from ABAG.

10.20

4) Page 1-39, Commute Patterns. The statement that less than half of all traffic on City streets originates and ends within the City is most likely true, but the statement is incomplete. Does the calculation include the state routes within the City? Seemingly the City counts and then does not count the state routes dependent on the purpose. What is the average for all jurisdictions? The statement is true for nearly all cities. How many of these one-ended trips are by City residents? How many of these trips that are not made by City residents end up as a net benefit to the City (a home-shop trip for instance)?

10.21

As the City acknowledges that cross-commuting will increase, given the analysis completed for the General Plan. What does the plan do to eliminate or reduce the cross-commute?



*Draft EIR*

10.22 | 1) The City's analysis depends entirely on examination of intersections. We would like to know how well the segments operate, particularly when the City appears to be addressing several problem intersections by adding lanes at the intersection only. This is seemingly most peculiar at Soscol/Kansas where six short through lanes are planned but at Soscol/Imloa two blocks away and with greater volumes, four lanes are claimed to be sufficient.


10.23 | 2) Page 3.3-3, Table 3.3-2. The intersection of 221/29 was measured by the CMA in 1994 at LOS B. We would like to see the count data for the intersection that indicates the current LOS at F. It is curious that the City intends no mitigations for the effects of its Plan at 221/29 (although Policy T-1.2 states otherwise). In fact, the City's "2020 with Roadway Improvements" scenario actually makes 221/29 operate slightly worse than the no improvement scenario. It would seem at the very least the City's plans should do no harm.

The City's analysis ignores many important locations across the valley where its commuting or otherwise traveling public will have consequential impacts. The City should consider broadening its analysis to examine additional locations and mitigating its impacts. As, for example, the Plan appears to do for 121/Trancas.

10.24 | 3) Page 3.3-9, Item 2. We agree that the LU analysis completed for the Plan, interpolating the 2020 LU back to 2000, indicates to the CMA's satisfaction that a CMP analysis of the General Plan is not required.

Thank you for the opportunity to comment, if you have any questions, please call me at 253.4351.

Sincerely,



John Ponte  
Manager



# THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

November 16, 1996

John Yost  
Planning Director  
City of Napa Planning Dept.  
P.O.Box 660  
Napa, CA 94559-0660

GENERAL PLAN COMMUNICATION #11



Re: CITY OF NAPA GENERAL PLAN; Draft Environmental Impact Report, October 1, 1996.

To begin with, I would like to state my personal appreciation for the goals set in the updated city General Plan. I believe the goal to maintain a permanent greenbelt of open space around the city is tantamount to preserving the identity of the city and preventing urban sprawl from consuming valuable natural resources. Perennial and seasonal wetlands have been reduced over 50% from historical acreages, oak woodlands are being cut at an alarming rate for fuel wood and urban development and grasslands which have been reduced by over 90% in Napa Valley by agricultural and urban development.

The question is, are the goals set out by this document likely to be met by the proposed alternative particularly as they relate to natural resources? As stated, the impetus for this update was to prevent excessive growth permitted under the 1982 plan. The suggested project alternative will add 440 acres to the city. How does this reduce the growth rate? Where will the county satisfy its growth mandate if these parcels are annexed. This action will put greater growth pressure on remote areas of the county.

It is my recollection that the people of Napa voted in the late 1970's to cap the population within the city to 75,000. Why is this fact not discussed relative to the proposed project in this document. In Table 2-3 and 2-4, it is stated that the projected "build out" of dwellings will be 34,938 units with a population of 81,000 persons. This exceeds the public wish by 11,000 persons. What is more, my calculator tells me that 34,938 units with an average of 2.55 persons per household means Napa will reach a population of 89,092 by the year 2020. This exceeds the plebiscite by over 19,000 persons or 27%. This raises the question: does the analysis of traffic, noise, pollution, natural resource impacts, etc. take this into account or all projections based on 81,000.

Will the plan, as stated on page 4-5, serve to "minimize the disturbance of native grasslands, wetlands ...". The document does not present an estimate of area, or state the nature of additional parks and open space that will be retained after 7,840 dwellings are built and 963 acres of commercial space are developed.

11.1

11.2

11.3



11.4 This plan will open the door for development of 600 dwelling units on the Stanly Ranch. Of the 2,000 + acres, 60-70% of the areas is diked historic marsh. This occurs both north and south of Horseshoe Bend. Enhancement of this resource would be to restore tidal action in this area. This historic marshland and associated seasonal wetlands essentially isolate any potential development from the city of Napa. Development here would not conform to the goal of maintaining a permanent greenbelt or confining the urban limits. This area would juxtapose urban residential to county commercial. The construction of urban infrastructure would make this a satellite community disjunct from the city proper. This area should be excluded from development to preserve the scenic entry into Napa which "leaves a lasting impression on residents and visitors" (page 2-10) and to insure the protection of valuable wetlands.

11.5 This document states on 3.6-3 that the "city would promote riverfront development" while also recognizing that riparian vegetation has been severely reduced by past and existing development. It would be in keeping with the goals of this project that riverfront development be limited and that scenic and biological values of the river be enhanced by restoring the riparian gallery where possible.

11.6 "Vernal pool complexes occur north of Green Island Road" (3.7-2). There are also scattered vernal pools within the remaining grasslands of the Big Ranch Road area and Foster Road area. These are muted in expression by current land uses but the hydrologic features remain. The importance of these, although not harboring rare species, can be demonstrated by the fact that all historic vernal pools have been extirpated between Napa and Calistoga due to agricultural and commercial development. Some means of protection should be determined at this time in keeping with Natural Resource Goal NR-1 and NR-2 (page 2-8).

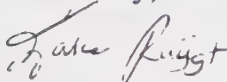
11.7 As described on 3.7-2 much of the remaining grasslands within the RUL are dominated by non-native grasses and forbs. The report further recognizes the importance of retaining some grasslands, chaparral and woodlands to prevent erosion and preserve the scenic qualities. It does not state the importance of preserving wildflower fields for similar reasons. This community is recognized as rare within the DFG's Preliminary Descriptions of the *Terrestrial Natural Plant Communities of California* (Holland, 1986). This community is represented in the Foster Road area. If this area is annexed, then a mitigation bank should be set up to preserve the few remaining acres of this plant community in the Napa area.

11.8 The list of sensitive plant species in the Napa area listed on page 3.7-3 and 3.7-4 are incomplete. Mason's *Lilaeopsis* is known to occur in 22 locations along the Napa River. In addition to rotting pilings as stated on page 3.7-3 it also occurs on intertidal banks. In fact this is the most common habitat utilized by this species along the river. Contra Costa goldfields may have historically occurred within the RUL of Napa but no precise record of such occurrence exists. Collection labels likely describe a population on Richland property outside of the RUL. A historic population on Silverado Trail north of Napa most likely has been extirpated although CNDDB records do not recognize this fact. Vineyard development destroyed the last remaining potential habitat there around 1980. The only known population of dwarf downingia in Napa was extirpated by industrial park development in south Napa in 1982. A population of alkali milkvetch (*Astragalus tener* var. *tener*) was also extirpated at the Bedford IP at this time. This species is currently considered rare and endangered. Reports of *Calistoga ceanothus* in the Napa



area are erroneous as this was a misidentification of holly-leaf ceanothus (*Ceanothus purpureus*) a similar species. There is no historic record of Brewer's dwarf flax in the Suscol Creek area (CNPS INVENTORY, Fifth Edition, 1994). However, there is a record of *Legenere* (*Legenere limosa*) there. This species is considered rare and endangered by CNPS. Lastly, a population of San Joaquin spearscale (*Atriplex joaquiniana*) was found near the south end of Napa in 1991. This species is a candidate for federal listing. Approval of further development with in the RUL should consider impacts to these sensitive species and recognize that populations of these species may occur at other locations containing the required habitat. These species need to be recorded on environmental sensitivity maps maintained by the city (3.7-7) and surveys should be required in areas where appropriate habitat exists.

Sincerely,



Jake Ruygt

Conservation Chairman

Napa Valley Chapter, CNPS

cc: John Pitt

David Magney

11.8





# NAPA COUNTY

CONSERVATION, DEVELOPMENT and  
PLANNING DEPARTMENT

Jeffrey Redding  
Director

1195 Third Street, Room 210 • Napa, CA 94559-3092  
Telephone 707/253-4416 FAX 707/253-4336

November 15, 1996

GENERAL PLAN COMMUNICATION  
# 12



John Yost, Planning Director  
City of Napa, Planning Department  
1600 First Street  
Napa, California 94559-0660

Re: City of Napa General Plan--Draft Policy Document and EIR

Dear John:

The Department of Conservation, Development and Planning has had a opportunity to review the City's Draft General Plan Policy Document, dated August 16, 1996, and offers the following comments.

Rural Urban Limit (RUL)

The draft document notes that "This General Plan emphasizes Napa's commitment to containing urban development within the Rural Urban Limit (RUL)." However, Figure 1-1 indicates that in fact the City intends to expand the RUL. While the draft document is not specific on how much unincorporated land will be added to the RUL, the EIR prepared for the draft document states it clearly on page 3.2-5. The City intends to expand the present RUL by approximately 440 acres!

This Department is very concerned about what we perceive to be a major policy change to the city's planning program; i.e., the expansion of the RUL. We are particularly concerned, as we expressed by letter dated March 15, 1994 (see attached), that a the 40 acre parcel that is be included in the City's RUL is zoned Agricultural Preserve. If the city is now establishing a new policy to urbanize designated agricultural land, this is a significant change in city policy. What will prevent additional or wholesale inclusion of similar lands in the future? This action by the city is clearly growth inducing and is not adequately evaluated by the city as part of the accompanying EIR. The city's draft document should be amended to include the discussion of the RUL expansions in the manner in which it is discussed in the EIR sot that the public clearly is aware of the city's intention.

12.1

Inclusion of land referred to as state property, southeast of Imola Avenue and Soscol Avenue is also of concern to this office. The County has a limited supply of land that is designated for urban uses. And, as you know, Measure J limits county options to

12.2





12.2 ↑ develop uses within designated agricultural areas. Measure J was approved by 63% of city voters. If the county is to address jobs/housing balance issues that the city has raised relative to the updated Airport Industrial Area Specific Plan, use of designated urban lands for future housing throughout the County must be actively evaluated. The city's intent to incorporate this urban area into its RUL may reduce future options for the county and could adversely affect County policy options to address jobs and housing balance.

#### Land Use and Transportation

12.3 The draft document does not address in a comprehensive way development at the Stanly Ranch. Although the document notes that the Stanly Ranch property is the largest piece of undeveloped land in the City (page 1-7), the impacts on the city's road network associated with its development are ignored. For example, no improvements to the city's circulation system (figure 3-1, Table 3-1) are planned in the vicinity of the Stanly Ranch even though on page 1-7, the draft document outlines considerable development is contemplated. It seems reasonable that a development of 550 homes and 300 short-term lodging units that will generate upwards of 7000 daily vehicle trips would necessitate some future road or intersection improvement. The conclusion that is reached on page 3-13 of the draft document that "... an inability to significantly expand road capacity, and growth-mean that congestion is likely to increase over time." should be paralleled in the EIR. The inescapable conclusion is that traffic impacts are significant, unavoidable impacts that cannot be mitigated to levels of insignificance rather than as is concluded on page S-4 and Table S-1 that "there are no significant unavoidable impacts anticipated from adoption and implementation of the Napa General Plan."

12.4 The draft policy document should also include some implementation program for funding of the proportionate share of regional and city trips that impact roads and intersections outside of the city limits. Many vehicles that travel through intersections and on roads in the county area bound for the city. A commitment by the city to funds its proportionate share of these needed improvements should be included in Implementation Measure T-1.C.

12.5 When the traffic section and conclusions reached in the EIR have been revised to address these comments, the document would assess the implications on local and regional air quality to ensure that the section on air quality reflects conclusions reached by the EIR on traffic and congestion.

#### Housing

12.6 ↓ The Department commends the City on its program to adopt an inclusionary zoning or in-lieu fee program. We hope that it will do so as soon as possible. In addition, the department would like to urge the city to include in its implementation program on housing a goal of cooperating with the County on the implementation of AB 3456

which enables jurisdictions in Napa County to share housing credits when they share in the development of new affordable housing units. The addition of a general policy statement reflecting joint cooperation between the city and county to provide for affordable housing opportunities within lands subject to city jurisdiction would also be appropriate.

12.6

Water

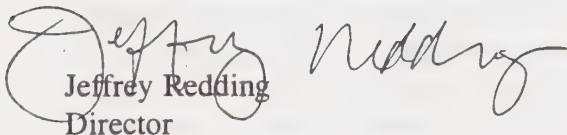
The EIR prepared for the General Plan is inadequate in its discussion of water since the EIR does not analyze the availability of water to serve projects that could reasonably be constructed within the documents planning horizon (i.e. 1996-2020). The August 16, 1996 draft policy document notes on page 4-11, "... the City will have sufficient water supplies to meet projected water demands **by** [emphasis added] the year 2012. . .". Given this short term shortfall in water supply, and, the foreseeable development of the Big Ranch Road project area the potential development at the Stanly Ranch, the conclusion of the EIR (Table s-1) that water impacts are insignificant is not borne out by the discussions found in the EIR. Without a firm source of water for the interval 1996-2012, we disagree that the impacts associated with water serve is insignificant. In addition, page 4-11 notes, "The City's water distribution system also has insufficient short-term storage capability to address current and projected needs." This, too, represents a significant impact that requires mitigation. Yet Table S-1 does not even identify this impact.

12.7

Thank you fro this opportunity to comment. Based upon these comments on the EIR and draft document, we expect that revisions will be made to the EIR and that it will be recirculated. We hoe that you will also recommend changes to the draft document to reflect our concerns relating to the RUL, Land Use, Housing, Transportation, and Water.

Please call me if I may be of further assistance or can clarify the comment in this letter.

Sincerely,

  
Jeffrey Redding  
Director

cc: Board of Supervisors  
Jay Hull, County Administrator  
Robert Westmeyer, County Counsel





## NAPA COUNTY

## BOARD OF SUPERVISORS

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MARY JEAN MCLAUGHLIN  
Clerk of the Board

RECEIVED

MAR 24 1994

NAPA CO. CONSERVATION  
DEVELOPMENT & PLANNING DEPT.

March 15, 1994

Ed Solomon, Mayor  
City of Napa  
955 School Street  
Napa, California 94559

Re: City of Napa Preferred Land Use Alternative

Dear Mayor Solomon:

We received a copy of the draft Preferred Land Use Alternative that is under consideration as part of the City's General Plan update. After reviewing the document, we discovered that the City Council had directed staff to include four properties within the Land Use Alternative which are not currently within the RUL. Two of these properties, The Napa State Hospital and a site on the northeast corner of Big Ranch Road and Trancas Avenue, have potential implications for the County's long range planning program. I am sending you this letter at the direction of the Napa County Board of Supervisors to advise you of some concerns that the County has regarding expansion of the RUL to encompass these two properties.

As you know, the County has been actively participating in a joint committee with representatives of other County cities to study ways to better address long term jobs and housing growth in the County. One conclusion that has become clear as a result of these discussions is that all jurisdictions need to maximize development of housing, particularly affordable housing, on appropriate lands within their jurisdictions. The County in particular must focus its attention on lands currently designated or potentially suitable for urban uses. This requirement to concentrate urban uses, such as housing, within urban areas derives directly from two voter adopted initiatives, Measures 'A' and 'J' which required the County to adopt an annual limitation on permits (Measure 'A') and prohibited the conversion of agricultural lands to urban uses without a vote of the people. These initiatives, binding as they are on County land use decision-makers, were approved by 51% of City voters in the case of Measure 'A' and 63% of City voters in the case of Measure 'J'. The interests of City residents vis a vis County land use policies were made clear by these votes. We think that these two votes also indicate direction to the City Council to limit annexation of County lands designated or potentially suitable for urban uses.

VINCE FERRIOLE  
District 1

FRED L. NEGRI  
District 2

MEL VARRELMAN  
District 3

PAUL BATTISTI  
District 4

MIKE RIPPEY  
District 5

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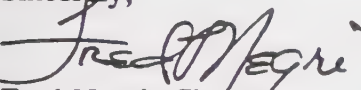


Page Two  
Preferred Land Use Alternatives  
March 15, 1994

We are concerned about the continuing loss of County lands suitable or potentially suitable for urban uses through annexation to adjoining Cities. Incorporation of the City of American Canyon removed lands that had long been designated for housing from County jurisdiction. These lands were intended to provide a portion of County housing needed from jobs generated in the airport area. Although the lands available for housing were reduced by virtue of incorporation, State requirements for the County to plan for the housing does not diminish with incorporation.

The same issue may arise with potential expansion of the RUL to include the Napa State Hospital and lands adjacent to the Big Ranch Road/Trancas intersection. Although certainly within the City's Sphere of Influence, these lands represent lands potentially suitable for County housing opportunities either by virtue of their designation or proximity to existing urban uses and services or both. Inclusion of these lands within the RUL signals the City's intent to annex them in the future. Removal of such lands through annexation will only serve to further reduce the County's ability and options to meet its housing requirements established by the State of California. For these reasons, we strongly urge the City Council not to expand the RUL to include the two mentioned properties.

Sincerely,



Fred Negri, Chairman  
Napa County Board of Supervisors

cc: City Council Members





# NAPA COUNTY

1195 THIRD STREET, ROOM 301, NAPA, CALIFORNIA 94559  
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OFFICE OF COUNTY COUNSEL

ROBERT WESTMEYER, County Counsel

GENERAL PLAN COMMUNICATION # 13

November 18, 1996

MARGARET L. WOODBURY, Chief Deputy  
 JOSEPH C. FOLKARD, Deputy  
 JAYNE F. HERMAN, Deputy  
 KEVIN C. STOBAUGH, Deputy  
 KELLY MORTON, Deputy  
 LAURA C. SPEEGLE, Deputy

Our File Nos. 7700.071

John Yost, Planning Director  
 Attn: Deborah Faaborg, General Plan Project Coordinator  
 1600 First Street  
 Napa, CA 94559



Re: *Comments of the County of Napa: City of Napa General Plan and EIR*

Dear Mr. Yost:

You will find enclosed the comments of the County of Napa regarding the draft EIR the City of Napa prepared in conjunction with its proposed General Plan update. As you will see from the comments, the County believes that the Draft EIR and accompanying documents are inadequate primarily because they fail to evaluate the regional impacts of the proposed changes to the City of Napa's General Plan and constitute dramatic changes in the communities land use policies. The County believes that in the areas discussed the draft EIR is so inadequate that a new draft EIR will need to be prepared and re-circulated.

13.1

The County appreciates the opportunity to comment on this very important document which has major adverse implications for the long standing City/County cooperative land use effort.

Very truly yours,

ROBERT WESTMEYER  
 County Counsel

JEFFREY REDDING  
 Director, Conservation, Development and Planning



COMMENTS OF THE COUNTY OF NAPA:

CITY OF NAPA GENERAL PLAN UPDATE

DRAFT ENVIRONMENTAL IMPACT REPORT

The County of Napa submits the following comments regarding the draft Environmental Impact Report (hereafter "DEIR") relating to the General Plan Update of the City of Napa. The Director of the Conservation, Development and Planning Department will be filing separate comments regarding the planning implications of the proposed changes to the City's General Plan. In addition to these comments, the County reserves the right to file additional comments regarding the merits, or lack thereof, of the General Plan update as the hearings on same progress.

## I. SUMMARY.

The City of Napa has proposed amending its General Plan and has prepared a DEIR for the purpose of evaluating the environmental effects that would logically flow from the amended General Plan. Unfortunately, the DEIR the City has prepared is inadequate in a number of respects and as a consequence fails to properly evaluate the environmental effects of the proposed General Plan Amendments.

The major shortcomings of the DEIR include the following:

1. FAILURE TO ADEQUATELY DISCUSS THE REGIONAL SETTING OF THE PROJECT. The California Environmental Quality Act (hereafter "CEQA") requires a DEIR to describe not only the local setting of the project but also the regional setting in which the project is located. The failure of the DEIR to adequately describe the regional setting of the project renders it inadequate as a matter of law. 13.2
2. THE DEIR FAILS TO RECOGNIZE /EVALUATE THE REGIONAL EFFECTS THE PROJECT WILL CAUSE. An EIR cannot be considered adequate if it fails to evaluate the effect development within the City will have on the region. The evaluation of the regional effects the General Plan Amendments will have, particularly in the areas of air quality, water supply, wastewater treatment and traffic, is inadequate. 13.3
3. THE DEIR'S TRAFFIC ANALYSIS IS INADEQUATE. The DEIR failed to include in its traffic computations the increased traffic that will be caused by a build out of the South Napa Marketplace Shopping Center and the development of the Lucky Supermarket at Lincoln Avenue. No direct discussion of the impact the Stanly Ranch development will have on the immediately adjacent intersection is included. Additionally, the City's reliance on the ABAG 96 projections is inappropriate since those projections end in the year 2015 and the draft General Plan is intended to project through the year 2020. 13.4
4. THE DEIR'S CONCLUSION THAT ALL TRAFFIC IMPACTS HAVE BEEN MITIGATED TO AN INSIGNIFICANT LEVEL IS INCONSISTENT WITH THE ANALYSIS CONTAINED IN THE DEIR. The DEIR identifies a number of traffic intersections where it concedes the 13.5

13.5 ↑  
traffic will continue to operate at LOS F, which the DEIR defines as a significant effect, while at the same time concluding that all traffic has been mitigated to an insignificant degree. The DEIR needs to be redrafted to resolve this inconsistency.

13.6  
6. THE CUMULATIVE ENVIRONMENTAL EFFECTS OF REASONABLY FORESEEABLE DEVELOPMENTS ARE NOT ANALYZED. The proposed General Plan changes the designation of the Stanly Ranch from a "Special Studies Zone" to intense residential development. It accommodates the creation of 600 new homes (1,400 residents) as well as a resort hotel and various other traffic generating commercial facilities. Yet there is no meaningful discussion of the impact such a development would cause anywhere in the DEIR. Nor is there a discussion of other pending and reasonably foreseeable projects such as the specific developments occurring within the Airport Industrial Area, the Lucky Supermarket or the development of the remainder of the South Napa Marketplace Shopping Center.

13.7  
5. GROWTH INDUCEMENT. The proposed amendments of the General Plan would accommodate the development of the Stanly Ranch as well as agricultural property east of Big Ranch Road. Both of these changes are growth inducing and yet there is no analysis of the growth inducing implications the buildout of these developments will have on the existing environment or long standing County General Plan policies that protect agriculture and open space.

13.8  
6. CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.

The City of Napa is proposing for the first time to bring within its Sphere of Influence (hereafter "SOI") and Rural Urban Limit Line (hereafter "RUL") of the City agricultural lands that are presently located within the Agricultural Preserve. Although the amount of lands being so included is small in comparison to the amount of land already within the City of Napa's SOI, the implications of this change are huge for the County's agricultural community, represents a radical shift in the policy of the City, and is inconsistent with the fundamental Goals and Policies of the Napa County General Plan. The fact that there is no environmental analysis of this issue, as there must be, renders the DEIR inadequate as a matter of law.

13.9 ↓  
The City of Napa has conceded in its draft documents that the long standing practice of the City of Napa is to provide housing for individuals that wish to live in southern Napa County, including housing for workers in the unincorporated area. In its comments regarding the County of Napa's proposed amendments to the Airport Industrial Area Specific Plan (hereafter



“AIASP”) the City has indicated it may no longer be willing to provide such housing in the future. Such a result may require the county to provide additional housing in the those areas of the county presently designated as urban and adjacent to the Cities of Napa and American Canyon as a result of its development of the AIASP. If additional housing is required, this necessarily will eliminate the open space nature of those lands and constitute a major change to the adopted environmental plans and goals of the City and County of Napa that have been in place for many years. If the City’s comments regarding the AIASP amendments represents the City’s new policy in this regard, it represents a significant environmental effect. In such a case, the proposed General Plan should reflect this change and the environmental effects of such a change must be analyzed.

13.9

7. **ALTERNATIVES ANALYSIS.** There is a lack of alternatives included in the DEIR. Specifically, there is no alternative proposed that contemplates not bringing the lands designated as AW/AP on the Napa County General Plan within the City’s Sphere of Influence. Nor, as LAFCO has suggested, has the alternative of de-annexing the Stanly Ranch been considered even though the Ranch is not currently within LAFCO’s adopted Sphere of Influence of the City of Napa. These are reasonable alternatives to the proposal which must be included in the alternatives analysis. Until they are the DEIR is inadequate as a matter of law.

13.10

## II. DETAILED DISCUSSION OF THE DEIR INADEQUACIES

### A. **PROJECT DESCRIPTION.**

CEQA requires that a DEIR include a project description that adequately describes the environment in the vicinity of the project as it exists prior to the commencement of the project from both a local and regional perspective. The description must enable an individual who reads the DEIR to be able to understand the significant effects of the proposed project on not only the locality but also on the region. 14 Cal.Adm.Code 151125. In this regard the DEIR is deficient.

13.11

Table 1–1 of the DEIR indicates that the regional setting description is contained the Draft General Plan document (Chapter 1: ‘Napa General Plan Context’ & ‘Environmental Constraints’) and in the Background Report. The ‘Napa General Plan Context’ discussion amounts to a brief historical discussion of job projections in the region. The regional environmental setting is ignored. The “Environmental Constraints” discussion is even worse. It contains not a scintilla of discussion of

13.11 regional issues despite the reference in the Draft EIR to that portion of the draft General Plan. Finally, the Background Report contains no meaningful discussion of the existing regional environmental setting particularly in regard to the regions present lack of sewage capacity, water availability in the near term, and the existing traffic situation. The DEIR reference to the Background Report also fails to identify precisely where in the Background Report regional issues are discussed. Such references are mandatory if a DEIR is to be deemed adequate. See 14 Cal. Adm. Code 15122.

## **B. REGIONAL EFFECTS NOT ADDRESSED OR INADEQUATELY ANALYZED.**

### **1. TRAFFIC**

3.12 The County is concerned about the enormous traffic impacts of the developments that will be accommodated by the draft General Plan, particularly the traffic impacts caused by the Stanly Ranch and Big Ranch Road developments and the failure of the City of Napa to address at all the impact those developments will have on the SR29/12 intersection. The County is also concerned that although the City's traffic study included the SR29/221 and SR29/121 intersections no mitigation measures, including but not limited to roadway construction, were proposed for the SR29/221 intersection.<sup>1</sup> The City's view, evident throughout the draft documents, is that its responsibility ends at the City limits. Such an approach violates the CEQA which requires a local agency to carefully review the regional impacts its projects will have and either provide a reasonable level of mitigation or concede that a significant environmental effect remains, no mitigation measures are feasible that would further reduce the impact, and adopt overriding findings.

The proposed changes to the City of Napa's General Plan contemplates including 440± acres within the City's Rural Urban Limit Line (hereafter "RUL"). 53 of those acres represent agricultural lands that have not previously been within the City's Sphere of Influence (hereafter "SOI"). It also will authorize extensive development in

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<sup>1</sup> No mitigation was proposed for SR29/12 either since that particular intersection was not studied at all.

the Big Ranch Road area and the Stanly Ranch area. In the Big Ranch Road area an unspecified number of additional homes are expected to be built. In the Stanly Ranch planning area the development involves 550–600 new residential units, a destination resort comprising 300 lodging units, with conference, meeting room and related facilities, an 18–hole golf course and clubhouse, a commercial wine center, a small winery and a boat dock providing public access to the Napa River. When development in other areas of the City are taken into account the proposed changes to the City of Napa's General Plan contemplates developing a grand total of 7,840 new homes.

Such changes will clearly have an adverse effect on traffic, not only within the City of Napa, but also on the various State Highways leading to the City of Napa. Despite this fact, the DEIR contains only a superficial discussion of the regional impact such development would cause on most State Highways and provides no analysis of the effect such development would have on the SR29/12 intersection. That a DEIR to be adequate is required to analyze the effect a project will have on major highways within a reasonable distance of the project is clear. *A Local & Regional Monitor v. City of Los Angeles* (1993) 12 Cal.App.4th 1773, 1785.

Although there is no analysis performed by the City evaluating the impacts this scope of development would have on SR29/12 some rough estimates can be made. For example, since 40% of the individuals occupying those 7,840 homes will commute to out of county jobs<sup>2</sup> these changes to the General Plan will result in the PM Peak trips increasing by approximately 3,000 trips per day. The resort hotel, golf course and Boat Dock presumably would add several thousand additional PM peak trips per day.<sup>3</sup> The current LOS for the SR29/121, SR29/221 and SR29/12 intersections has been estimated by the Congestion Management Agency as LOS D.

<sup>2</sup> The Background Report (at p. 1–38) indicates that in excess of 40% of city workers commute to out of county jobs. Clearly the majority of these individuals will commute south thereby impacting SR29/121, SR29/221 and SR29/12 intersections.

<sup>3</sup> The Final EIR involving the Gasser Estate Project projected that the Napa Resort Hotel would have generated approximately 4,673 total trips per day (Page 5–15). Although the DEIR needs to analyze the Stanly Ranch Resort Hotel situation and is inadequate for not having done so, it is assumed the trip generations by any resort hotel would be similar.



3.12 Although the DEIR fails to analyze the situation, it seems likely that these additional PM peak trips per day will cause the LOS to degrade to F. Thus, it seems likely that when the development authorized by the proposed amendments to the General Plan of the City of Napa are accomplished the traffic will revert to LOS F solely as a result of City development. The recent study performed by Dowling & Associates for the AIASP validates this conclusion. That study indicates that SR29/121, SR29/221 and SR29/12 intersections are already at LOS E or F.<sup>4</sup> Thus, under either analysis, the additional development proposed by the City of Napa in its revised General Plan will significantly aggravate an already unacceptable LOS.

In sum, all of these developments will significantly impact the regional traffic patterns in the Airport Industrial Area. The DEIR is inadequate as a matter of law for failing to discuss this environmental impact and doubly inadequate for failing to propose feasible mitigation measures. The DEIR needs to be revised and recirculated with specific mitigation measures included that will commit the City of Napa to provide its fair share of the costs of improvements necessitated by its development.

3.13 Finally, it seems clear from a review of the various documents relating to the DEIR that incorrect traffic projections were utilized in two areas. First, the ABAG projections that were used were not sufficient in that those projections only reach the year 2015 (or 2010 if the 1994 ABAG projections are utilized). Second, the Background Report indicates that the City Base data used for the CMP Model was the same data used by the City of Napa in making its traffic projections in the General Plan (at page 1-29). In discussing this matter with John Ponte of the CMA he advised that the CMP Model 2000 did not include data relating to the buildout of the South Napa Market Place Development nor the development of a Lucky Superstore at Lincoln Avenue and State Highway 29. This is significant since the Final EIR on the Gasser project clearly indicates that, upon buildout the LOS would drop to LOS E and LOS F at most locations (See Table 5-1 of the Gasser Estate Project Final EIR). An EIR, of course, that does not contain sufficient information or, as seems to be the case here, is based on erroneous information, must be withdrawn, rewritten and recirculated. In short, these

<sup>4</sup> Appendix B: Traffic Calculations; SR29/121 (LOS E) , SR29/221 (LOS F) and SR29/12 (LOS F)

errors not only impact the regional issues previously discussed but also call into question the validity of the entire environmental analysis of transportation on both a local and regional level.

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13.13

## B. SEWAGE.

The County's traffic comments are equally applicable in the case of sewage. The County is concerned that the Stanly Ranch and Big Ranch Road developments in particular will have a major impact on the ability of the Napa Sanitation District (hereafter "NSD") to provide adequate levels of service to the Airport Industrial Area and yet there is no analysis of this issue anywhere in the DEIR or accompanying documents. The comments of the NSD regarding the DEIR concur with this view. The City's view again seems to be that its responsibility to environmentally assess its projects ends at the City limits. Such an approach violates the CEQA which requires a local agency to review the extra-territorial impacts its projects will have and provide a reasonable level of mitigation. This is particularly important in a DEIR that evaluates the impacts of a policy level documents such as is here involved.

13.14

The DEIR needs to be rewritten to discuss in detail the existing sewage capacity of the NSD, if any. It also needs to evaluate whether or not Phase II of the Sewage Treatment Master Plan is feasible. Areas of discussion should include, but not be limited to the following:

1. Whether the existing revenue stream of the NSD is capable of financing the Phase II Sewage Treatment Master Plan;
2. Whether the existing revenue stream of the NSD is capable of financing the Phase III Sewage Treatment Master Plan since Phase II will only permit the NSD to serve through the year 2012;
3. The effect the passage of Proposition 218 will have on the ability of the NSD to finance Phase II/III improvements to the extent the existing revenue stream will not support financing the improvements.

13.15

Finally, the DEIR's discussion of proposed mitigation is inadequate. It is not sufficient to simply state that "The NSD's 1990 Wastewater Master Plan recommends improvements to address future wastewater treatment and disposal needs for the City"

13.16  
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13.16 and that "The NSD has begun to implement phases of the Master Plan designed to ensure that the district will be able to meet the City's projected demands." An analysis that discusses the projected development, the daily wastewater flow and the data upon which those figures were based is required. Following that analysis, how those demands will be met needs to be discussed. This inadequate environmental analysis also affects the cumulative impact analysis as will be discussed more fully below.

### C. CUMULATIVE IMPACTS.

13.17 The cumulative impact analysis fails to comply with §15130 of the CEQA State Guidelines. Failing in this, the DEIR's analysis of cumulative impacts is inadequate as a matter of law. *San Franciscans For Reasonable Growth v. City and County of San Francisco* (1984) 151 Cal.App.3d 61. Further what little analysis that exists is overly abstract. There is no meaningful discussion of the impacts reasonably foreseeable future projects in the City of Napa such as the Stanly Ranch and Big Ranch Road developments will have. Nor is there any discussion whatsoever of projects that are presently occurring within the AIASP area even though the City of Napa was fully aware of such projects.<sup>5</sup> Such failure, as the City of Napa has phrased it in its comments on the DEIR involving the AIASP, "renders the impact analysis invalid, abstract and shrouds the concrete impacts the development within the City will actually cause." Relying on abstract and high conceptual reports, such as ABAG reports, as justification that further cumulative impact analysis is not required is insufficient as a matter of law.

### D. THE DEIR ANALYSIS DOES NOT SUPPORT ITS CONCLUSIONS.

13.18 In a number of instances although the DEIR analysis identifies significant unmitigated environmental impacts, the conclusion is reached that all impacts are

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<sup>5</sup> In its comments to the DEIR involving the AIASP the City argued that there were numerous projects that allegedly were not adequately analyzed including the WIG Resort Hotel and the Windmill Inns of America project. The City cannot argue that the County DEIR should address these projects but the City DEIR is not required to do so.



reduced to a level of insignificance. In the case of a DEIR, of course, conclusions that are unsupported by the evidence cannot stand.

For example, the DEIR concedes that in some locations the Level of Service will remain at LOS F even after the imposition of mitigation measures (SR29/Trancas). In other areas a LOS F is identified and no mitigation measures of any kind are proposed (SR29/221). In still other areas, as has been previously discussed, the LOS is not even analyzed (SR29/12) despite the fact that the proposed General Plan will accommodate development that will have a significant effect on that intersection. LOS F, in turn, is defined by the DEIR as constituting a significant effect on the environment.

In other areas the intersection is defined as LOS F (Sierra Avenue) and it is summarily concluded that a single instance is not considered a significant effect. This might be true except for the fact that the Circulation Element then proposes rerouting large portions of the traffic from the Big Ranch Road development to Sierra Avenue rather than to the signalized intersections at Trower Avenue and Trancas Avenue. Additionally, the DEIR's mitigation measure for SR29/Trancas involves closing Sierra Avenue to SR29 access and there is no discussion regarding the manner in which the Big Ranch Road traffic bound for SR29 will be dealt with once the SR29/Trancas mitigation measure is implemented.

This type of analysis, which occurs throughout the DEIR does not support a conclusion that all significant effects have been mitigated.

Similarly, in the case of wastewater, the DEIR concludes there will be no significant impact even though no mitigation measures are proffered.

#### **E. GROWTH INDUCEMENT.**

The DEIR fails to recognize the growth inducing aspects of the proposed draft General Plan. The Stanly Ranch is presently serviced with no sewage infrastructure and minimal infrastructure providing a water supply to the area. The growth inducement aspects of providing the needed infrastructure is not discussed anywhere in the DEIR or accompanying documents. More importantly, the development of the Stanly Ranch will result in the virtual enclosure of 800±a acres or agricultural/open

3.20 ↑ space lands. The pressure to develop this property would be enormous. Additionally, the pressure to urbanize additional lands outside this 800± acres but which are immediately to the north of the Stanly Ranch would also be intense.

In the Big Ranch Road area, the draft General Plan proposes for the first time to include within its Sphere of Influence lands on the east side of Big Ranch Road. Big Ranch Road has always been considered an agricultural “dividing line” identifying the City limits. Once this line is breached the pressure to increase the City Limits to the Napa River will be intense. Only in this case the acreage that will be subjected to development pressures involves thousands rather than hundreds of acres.

The failure of the DEIR to discuss the growth inducing aspects of these matters renders the DEIR inadequate as a matter of law. This is particularly the case in a policy documents such as the General Plan where growth inducement is always a serious and significant factor. The inadequacy of this element of the DEIR requires that it be withdrawn, redrafted and recirculated.

#### E. CONFLICTS WITH ADOPTED ENVIRONMENTAL PLANS AND GOALS.

3.21 ↓ Appendix G of the State Environmental Guidelines provides that a project will normally have a significant effect on the environment if it will conflict with adopted environmental plans and goals of the community in which it is located. The Napa County General Plan has long provided that agricultural lands should be protected and not urbanized. Thus Goal #1 of the Napa County General Plan provides that the purpose of the general plan is to plan for agriculture and related activities as the primary land uses in Napa County and concentrate urban uses in the County’s existing cities and urban areas. Goal #6 provides that the General Plan is intended to ensure the long term protection and integrity of those areas identified in the general plan as agriculture and open space. The County and the City have adopted general plan policies supporting this concept.

The proposed draft General Plan, on the other hand, now proposed to begin the process of ultimately annexing agricultural lands into the City of Napa which clearly conflicts with the above adopted environmental plans and goals of both jurisdictions.

This by definition amounts to a significant environmental effect which has not been discussed or mitigated. The DEIR needs to be revised to identify this change by the City as a significant environmental effect and propose feasible mitigation measures to deal with the effect.

13.21

Similarly, the City of Napa in its comments regarding the DEIR that has been prepared for the AIASP has indicated it may be abandoning its long standing policy of providing housing within the City of Napa, to the extent required, for individuals that are working in the unincorporated area. If this is the case, the portions of the DEIR that indicate to the contrary needs to be revised and an analysis of the effect this change in long standing city/county policy to protect the environment will have.

13.22

#### **F. AIR QUALITY.**

Due to the fact that the traffic measures are not properly analyzed, the air quality issues are also improperly analyzed. The County believes that once the traffic analysis is completed in a satisfactory manner it will demonstrate that a significant effect on air quality exists which must be resolved through appropriate mitigation measures. Unfortunately, it is not possible for the County to comment on the air quality problems until a revised traffic analysis is completed.

13.23

#### **G. MISCELLANEOUS.**

The DEIR fails to discuss meaningfully the Napa County General Plan and the extent to which the draft City General Plan is inconsistent with the County General Plan. This failure violates the State Environmental Guidelines. See 14 Cal.Adm.Code 15125(b)

13.24







Sierra Club Napa County Group  
PO Box 644  
Napa, CA 94559

14.

SIERRA CLUB

GENERAL PLAN COMMUNICATION # 14

November 18, 1996

John Yost, Planning Director  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559



Dear Mr. Yost:

Attached please find the Sierra Club Napa County Group Written Comments on the City of Napa Draft Environmental Impact Report and Draft General Plan Policy Document *Envision Napa 2020*.

These comments represent our values and goals, and provide options for responsible and successful development of the City of Napa. We have achieved this through a critical analysis of the General Plan, the mitigation measures therein, and potential impacts as described in the Draft EIR and as illustrated by us. We believe that the changes we offer to you provide a good foundation for smart development that protects and utilizes our natural environment to make Napa an even better place to live.

We appreciate the opportunity to provide our written comments and look forward to continue working with you in our effort to ensure that the Draft EIR and General Plan protect our rich natural resource heritage while enhancing our quality of life.

Sincerely,

Anthony Norris, Chair  
Sierra Club Napa County Group

**SIERRA CLUB NAPA COUNTY GROUP  
WRITTEN COMMENTS ON THE CITY OF NAPA  
DRAFT ENVIRONMENTAL IMPACT REPORT AND  
DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020***

**I. INTRODUCTION**

The City of Napa now has a decades old heritage of protecting its open space, with gusto. This effort has provided all of us with world famous vineyards and other agricultural practices, charming vistas, protected enclaves of native animal and plant species, growing recreational activities, rising consciousness of the potential glory and beauty and bounty of the Napa River, and a strengthening community will to improve on our heritage. The Draft General Plan and Draft Environmental Impact Report speak to our desire to protect and enhance our natural environment while improving our quality of life. Many aspects of these documents are commendable.

However, there are significant errors and omissions that we must address. In these written comments we strengthen hollow mitigation measures and consider impacts not included in these documents. Some mitigations in the Draft General Plan are actually plans to determine impacts or adopt policies at a later date. For example policy NR-4.4 states "The City shall adopt standards and regulations for the reduction and/or elimination of the nonpoint sources of pollution." However, Public Resource Code §21002 and §21081 and California Environmental Quality Act Guidelines §15002 and §15091 state that mitigation measures cannot be allowed to be developed at a later date. This was supported in a court case *Sundstrom v. County of Mendocino*. Therefor this Draft Environmental Impact Report's attempt to identify and analyze impacts of mitigation measures yet to be developed make this Draft Environmental Impact Report inadequate. Finally, the Draft General Plan, which contains the mitigation measures for the Draft Environmental Impact Report, has not been adopted. Any changes to this document will then require that the Draft Environmental Impact Report be revised and made available for public review and comment.

Also, the Draft Environmental Impact Report has too many cross references. In the California Environmental Quality Act Guidelines §150 it states that this document must be understood by the reader without the need of undue cross references. The California Act was modeled after the National Environmental Policy Act, and it states that in *Baltimore Gas and Electric Co. v. Natural Resources Defense Council* that an Environmental Impact Report should be essentially a self-contained instrument. The City of Napa Environmental Impact Report references numerous documents, including the Draft General Plan, the Background Document, fiscal analysis, BAQMD CEQA Guidelines, the Water System Optimization and Master Plan, and Policy Resolution No. 27.



## II. THE DRAFT EIR COMMUNITY INPUT PROCESS IS FLAWED

This process initiates an environmental review of an incomplete Draft General Plan (DGP). Major issues, as identified by the Draft Environmental Impact Report (DEIR), still remain. They include developing the floodplain, the extension of the Rural Urban Limit (RUL), a higher density housing infill strategy, and growth management measures. (p. S-4,5). The City of Napa (City) must arrive at a stable and definite project before a valid environmental review may be conducted. The DGP process could have included an effort to address and/or resolve these issues before conducting the environmental review. Without this, the DEIR cannot identify and mitigate for potential project impacts. For example, the DEIR does not address the impacts of flood plain development without a flood project, although the intent of the DGP is to allow development in this area, whether with or without a flood control project (HS-3.9, LU 9.6, p. 1-21 objective #4).

## III. IMPACT IDENTIFICATION AND ANALYSIS IS INADEQUATE, AND MITIGATION MEASURES ARE OFTEN VAGUE

The DEIR makes some attempt to identify impacts, and normally makes no attempt to analyze them. Usually the reader is expected to except the City's assertion that all mitigations in the DGP prevent any significant adverse impact of implementing the preferred alternative of the DGP without supporting data. At times there are contradictions between the DEIR and the DGP.

### A. Land Use

The DEIR in Land Use Section 3.2 states that within the Rural Urban Limit (RUL) "Usable acreage does not include environmentally sensitive areas or waterbodies since those areas are generally not considered suitable for development." (p. 3.2-3). This is in contradiction to the DGP, where in Chapter 1, page 1-1, it states that "This General Plan emphasizes Napa's commitment to containing urban development within the RUL. As a result, much of the new development will occur within existing neighborhoods *and in areas with sensitive constraints, (e.g. hillsides, floodplain).*" The DEIR seems to preclude development in environmentally sensitive areas while the DGP allows this practice. The DGP, on page 1-21, also allows "the reclamation of lands near the river for sensitive urban use." Our recommendations for improved mitigation measures go a long way towards removing this contradiction.

The DGP and DEIR discuss maintenance of the RUL for at least the next 25 years. This would serve to help protect the region's natural resources into the next century. However, the DEIR does not adequately address land use impacts within the RUL, or added RUL expansions. The Big Ranch area includes significant open space, native vegetation, flood control, and watercourse characteristics, yet impacts of the DGP on these beneficial uses and resources are not considered. Stanly Ranch is even more sensitive. Both these areas have land use proposals in place. The DEIR cannot ignore current land use proposals and their potential impacts, especially on the scale of these two areas.

The DGP attempts to defend conversion of these lands and avoids discussion of development impacts because 1) it is consistent with the DGP (i.e. with itself) and zoning, and 2) the recommended land use is actually an expression of the collective vision of the community. (p. 3.26)- These are not mitigations but verbiage that avoids discussion of adverse impacts. Further discussion of the Stanly Ranch area is provided below.

Impacts and growth inducing effects of the proposed RUL expansions are not adequately addressed. RUL expansion would envelope 440 acres of property. The DEIR dismisses the impacts of the RUL expansion encompassing the Napa State Hospital, asserting that the grounds are already "urbanized". In fact, undeveloped portions of hospital land serve as a buffer between developed portions of the property and the adjoining Skyline Park and additional open space to the south. Though purchase of a 100 acre portion of the property is the subject of negotiations between the State and private development interests, the DEIR does not consider the impact of more intensive use of the property that would be accommodated by its inclusion within the RUL. In fact, the City offers no justification for embracing these areas within the RUL other than a vague effort to "improve the area's defensibility". (p. 3.25).

Significant adverse impacts of including the 13 acre Foster Road area parcel are also not adequately addressed. The high elevation area is lacking in sewage, water, and safety services and is in a seismic hazard area. The City cites no legitimate benefit of including this area within the RUL.

The DGP policy A-2.1 sets out criteria for expanding the RUL. (p. 9-2). The DEIR fails to identify and analyze impacts of additional RUL expansions that would be allowed by this policy before the year 2020. Numerous parcels contiguous with the current RUL are eligible. The impact of these potential RUL expansions and the impacts of related growth and infrastructure and public service demands must be addressed by this EIR.

The growth rate projection and resulting impact analysis in the DEIR are not valid. The DEIR asserts that the DGP incorporates a "confined city policy" to maintain the current RUL and incorporates a "development pacing" strategy so that land within the RUL will be available for development throughout the 25 year planning period. Yet DGP policy contradict these goals. Policy A-2.1, described above, provides additional RUL expansion with no time restrictions. RUL expansions beyond those reviewed in the DEIR could begin immediately. Further, the DGP maintains that monitoring annual growth will let the City know when growth limits are needed. However, no methods of limiting growth are identified by the DGP. Absent any expressed growth limit, the City cannot promise availability of land within the RUL over time. Also, the DEIR is void of any consideration of the potential impacts of more rapid growth that may occur should favorable economic conditions develop. Growth rates analyzed in the DEIR have no validity: the 1996 ABAG projections show a growth rate that has already accelerated beyond the City's projections.



We suggest the following changes.

Delete policy A-2.1.

Create an LU designation: resource area for environmentally sensitive zones where development is inappropriate. The designation would be applied to Stanly Ranch wetlands, the Giovannoni peninsula, wetland areas within the RUL along the Napa River into its tributaries, and habitat of threatened and endangered species. All wetland areas will be mapped and rated for habitat value.

Goal 6 (policy changes and additions are printed in bold and underlined)

LU-6.A The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, **and natural resource/environmental** focus for downtown.

Responsibility:       Redevelopment & Economic Development  
                               Planning Department  
                               Community Resources  
                               City Council  
                               **Parks and Recreation**

Goal LU-9

LU-9.2 The City shall continue to apply special development standards to proposed development within **¼ mile of** the following areas:

- a. Riparian corridors and wetlands
- b. Hillsides
- c. Critical wildlife habitat; and
- d. Agriculture land outside the RUL.

Use of the ¼ mile buffer permits identification and mitigation of most direct adverse impacts on these resource and makes the policy measurable and more enforceable.

The DEIR fails to adequately analyze the substantial alterations in type and intensity of land use proposed for the Stanly Ranch. The DGP indicates that there is a proposal to develop Stanly Ranch as a destination resort “comprising of 300 lodging units, with conference, meeting room, and related facilities. An 18 hole golf course and clubhouse with recreational amenities are also planned.” (p. 1-7). Also included in the plan are 550 homes and a commercial wine center. It provides for a Floor-Area-Ratio (FAR) of 0.50, but potentially up to 1.0. This proposal is clearly not in keeping with the character and identity of the surrounding area. It is wholly inappropriate for development on the fringe of the RUL. Such development would remove high quality vineyard land from use, generate substantial traffic, increase water runoff due to construction of impervious surfaces, and assault the visual aesthetics of the area.

In addition, the DGP would allow an island of significant urban development to replace the largest open space area within the RUL. This would result in loss of viable vineyard,



grazing, and wetland areas. It would also encourage sprawl in contradiction of the stated objectives of the DGP.

The DEIR overlooks the loss of agricultural lands by suggesting they be viewed in the context of “the greater Napa Valley” and suggests that Class I and II soils are the only lands suitable for local agriculture. But small vineyards of unusually high value are located on other classes of soils throughout the region. Many Valley vineyards, though small in the context of the greater Napa Valley are of critical value to specific local wineries in the local premium wine industry. Their significance cannot be measured simply by acreage or general soil class. Stanly Ranch is located in the Carneros Region, a world renown grape-growing appellation, and its vineyard lands ought to be recognized as some of the most valuable in existence.

Yet the DEIR fails to identify and analyze any impacts of the Stanly Ranch proposal.

The DEIR suggests that the DGP is consistent with adopted environmental goals of other local and regional jurisdictions. Development of the Stanly Ranch would place public utilities, housing, outdoor recreation, and commercial facilities in the flight path of the airport. The DEIR avoids identification and analysis of impacts to and from airport operations, saying that the Airport Land Use Commission would need to review any Stanly Ranch development plan. The review by itself cannot mitigate. As noted earlier, a DEIR cannot refer mitigation measures to be developed at a later date. This failure is another inadequate feature of this DEIR.

We request that a Specific Plan be required for any Stanly Ranch development proposal.

## B. Transportation

The standards of significance are insufficient. Here the significance of impacts is only defined in terms of “level of service” (LOS). The DEIR ought to discuss and quantify impacts in terms of actual traffic volume. The only standard of adverse significant impact considered is the midrange LOS E. The DEIR thereby ignores actual change in traffic volumes and the accompanying impacts. Furthermore, performance of roadway segments is not addressed. This level of impact analysis is not acceptable in a DEIR. Traffic volume assumptions for noise, air quality, and biological resources should be disclosed.

Impacts of roadway expansions/extensions are not addressed. The DGP calls for roadway extensions and widenings over several creeks, identified in table 3-1 of the DGP as Solano Avenue, Soscol Avenue, Gasser Drive, and Terrace Drive. Road creek crossings have been found to be significant contributors to flooding in the City, yet flooding impacts, not to mention creek habitat and fish and wildlife impacts, were not identified and analyzed. This is due to the fact that the DGP does not include mitigation policies. Impacts of roadway widenings at Soscol Avenue and realignments at California Boulevard are not discussed. The DEIR is inadequate in this area.

The DEIR assumes it can build itself out of traffic problems that are caused by its land use policies. But the likelihood of funding for roadway improvements -- widenings, intersection changes, road connectors -- is not addressed. The DGP proposes a number of assessment districts and prays that other funds will be available through state and federal agencies while providing no indication of whether or not these funds are available. Funding sources for these improvements are not identified. Thus DGP funding policies are not suitable as mitigation measures. As before, the traffic impacts disclosed in the DEIR are invalid because they are based on road improvements not paid for in the mitigation measures of the DGP. The DEIR simply assumes that they will be built.

The DGP encourages bicycle use. Unfortunately, there is no implementation program for this mitigation, and no identification of funding responsibility, or potential. At this point we have to expect that the City is not serious about boosting bicycle use at this time.

The DEIR states that the "transportation system is well developed and is built out to its maximum requirement in most locations." (p. 3.3-1). The DEIR fails to provide data to substantiate this claim, so it would appear to be a subjective observation. Many in the community would disagree with the claim that the City has a well developed transportation system.

In regards to public transportation, policy T-5.2 states that "bus routes should be located within ¼ mile of 85% of city residences" to mitigate for aspects of the project. (p. 3-19). The DEIR states as fact that this goal is currently met by City's bus system. However the DEIR fails to provide data to support this assertion. For example, many Browns Valley residents may be further than ¼ mile from the nearest bus route. In addition, the DEIR fails to discuss the efficiency of the City's bus system. For example, it can take approximately 1 ½ hours to travel by bus from Salvador Elementary School to Browns Valley Elementary School. The same trip may take 10 to 15 minutes by private vehicle. It would seem, then, that the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances. The DEIR must provide a more critical analysis of the City's public transportation system and include a discussion of the beneficial and adverse impacts. An increase in efficiency may encourage more motorists to use public transportation. We would like to see policies aimed at developing a more efficient public transportation system.

The DGP policy T-10.1 encourages owners of rail lines to maintain their systems as a mitigation measure to transport goods, and eventually people. The impacts of this policy deserve discussion in the DEIR for its potential to mitigate impacts of this plan including, but not limited to, increased resident and tourist traffic in and out of the Napa Valley.

## C. Community Services and Utilities

### a. Police and Fire

The DEIR impact analysis indicates that RUL extension will not extend response times. However, this assertion is not based on any data provided in the DEIR.



The Stanly Ranch development would require police and fire service for an extensive resort complex and around 550 housing units, representing a large increase in service demand. Yet the DEIR states that demand will not significantly increase since the Stanly Ranch is “within the RUL and existing beat structures.” (p. 3.4-5, #1). This assumption is not supported by any analysis and certainly makes no intuitive sense.

The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City. It is assumed that NSH police would continue to cover the area themselves, again with no analysis to support the assumption. It is conceivable that in the future the City police department would become responsible for at least part of the service area of current NSH property. In fact, we are aware of on-going negotiations that would result in the sale of NSH property for development. The impacts on increased fire and police response times to subdivided areas of current NSH property must be addressed in this DEIR.

Impacts of increased fire and police response times to the RUL expansion area west of Foster Road are not analyzed in this DEIR. Due to the acknowledged low water pressure in this area, impacts of additional development in this area could further reduce water pressure. This could have significant adverse impacts on fire service.

#### b. Water Supply

The DEIR assumes that the DGP “would not result in demand in excess of the City of Napa’s water supply system.” (p. 3.4-6). Then it admits that this is not the case in times of multi-year droughts. Next it states that multi-year droughts are not expected during the period of this general plan. How did the City reach this conclusion, especially in light of the 1986-1992 drought? On what data is this assertion based? How can the community be reasonably sure it will not experience a multi-year drought in the next 25 years? Indeed, this is a dangerous, and baseless, assumption.

The DEIR also states that “water entitlements from the State Water Project (SWP) are growing significantly faster than projected growth in water demand in the City.” (p. 3.4-6). Below that we learn that “periodic, unresolved environmental problems in the Sacramento River Delta ... make the reliability of the SWP entitlements unpredictable.” (p. 3.4-6). It would appear that the City’s water supply is indeed vulnerable. The potential impacts of increased growth with reduced SWP water supplies must be identified, analyzed and mitigated.

Mitigation measures in Goal CS-9 anticipate multi-year droughts but only implement the Water System Optimization and Master Plan. Implementation programs are not provided for the remaining policies under the goal. (p. 4-11,12). The Master Plan is not explained in the DEIR and its funding mechanism is missing. In fact, the City Council eliminated the latest strategy to pay for the Master Plan implementation due to public outcry. Thus the City is currently left without a plan to mitigate for growth impacts on water supply. The DEIR must provide this information so the entire community may be aware, and to minimize cross-reference to other documents as required by CEQA.



The impacts of providing water service to the RUL expansion area west of Foster Road are not analyzed or disclosed. The City is well aware of the problems of low water pressure in this area. Additional development will further worsen the water pressure problem in this area. Impacts should include, but not limit itself to, requirements for additional infrastructure to serve this area.

The DEIR asserts that the policies and implementation programs of the DGP will mitigate impacts of increasing wastewater treatment, storage, and disposal. These impacts will be mitigated primarily through additional facility construction and greater surface applications of partially reclaimed water. However, the DEIR fails to identify and analyze impacts of increased waste water treatment facilitates and surface applications of effluent. Potential impacts such as greater outflow to the Napa River in wet months, higher storm water flows into existing and new facilities, increased pond capacity, and expanded surface applications could be quite adverse. The DEIR states that impacts may be significant "... if development occurred in areas outside the planned sewage service boundary." (p. 3.4-4). However, no attempt is made to identify, analyze, nor mitigate this impact.

#### c. Trail Development

Without analysis or identification of potential impacts, the DEIR states that construction of the proposed trail system may have impacts on sensitive biological resources. We agree, and add that potential soil erosion, stream bank degradation, fish and wildlife disturbance, downstream sedimentation effects, etc., may be significant and adverse. Later in this document we offer stronger mitigation measures to ensure a lower level of impact.

#### D. Visual Quality

The location of the two southern gateways are arbitrary and inappropriate. Heading north the Napa Valley, travelers obtain their first perceptions of the City soon after entering the area around the Southern Crossing or from 221 by Suscol Ridge. It is here that the City and the valley are revealed. It is here that our community will be best served by maintaining high visual quality standards. We suggest the following changes to the visual gateway locations and mitigation measure of the DGP (policy changes are in bold and underlined):

##### Figure 1-3: Visual Gateways

Relocate the SW gateway area south to the junction of 12/121 & 12/29 and extending south past the Stanley Ranch and east to the Southern Crossing.

Relocate the SE gateway area south to the 12/29 & 221 junction closer to the Southern Crossing.

##### Goal LU-1

LU-1.5 The City shall refine the locations and concept of the key gateways to the city identified in Figure 1-3, and shall establish gateway and scenic corridor design and guidelines for both public and private development to ensure attractive entrances to

the City. The visual gateways shall incorporate green ways, open space, riparian corridors, and wetland areas.

The development proposal of Stanly Ranch has potential significant adverse impacts on the visual quality, scenic corridor, and gateway features of the City. The Ranch is visible from the 29 River Bridge and from 12-121, a state designated scenic highway. However, these impacts are not identified nor analyzed in the DEIR. We believe that the development proposed for Stanly Ranch is not in keeping with the current character and identity of the area. We submit that this proposal would be a significant adverse impact as defined in the DEIR Significance Criteria, in that it "results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view."

Additional residential development of the RUL expansion area west of Foster Road would create very visible development on open, steep hills. The visual impact significance of the hillsides is dismissed as insignificant by the DEIR. Surely this is a controversial and subjective decision. Development of nearby hillsides at Westwood Hills Park has been controversial for years, subject of numerous public reviews, news paper articles, and public letters. Yet still, the DEIR ignores significant adverse impacts of aesthetically offensive housing development on hillsides. As we are aware of a proposal to purchase 100 acres of State Hospital land for development, the DEIR is required to identify and analyze the visual impacts of any development in this area as well.

#### E. Biological Resources

The DEIR acknowledges the sensitive nature of salt marsh species, and without analysis asserts that mitigation measures in the DGP make any impact insignificant. The DEIR simply references policies and implementation programs and assumes that these will mitigate any significant adverse impacts. The DEIR fails to show how adverse impacts of development in these very sensitive areas will be mitigated. Moreover, as mitigation the DEIR refers to policy LU-9.2 that says "The City shall continue to apply special development standards" yet makes no attempt to identify these standards. This is unacceptable. Mitigation is vague and circumvents public review of the impacts on salt marshes due to implementation of this DGP.

However, we agree with the DEIR when it states that "Potential impacts ... can be avoided by not developing any portion of a jurisdictional salt marsh." (p. 3.7-8). This is not secured by designating salt marshes and other sensitive environmental areas as PS-Public Serving, as does the DGP. This designation allows a Floor-Area-Ratio (FAR) of 0.40, potentially allowing 40% of these rare and vital areas to be developed. This would indeed be an adverse significant impact. We suggest a new designation, OS-Open Space. It is taken from the PS designation and would not allow development, although incidental improvements such as trails, visitor centers, rest rooms, etc., would be appropriate. Sensitive environmental areas, including remnants of native vegetation, within the RUL ought to receive strong consideration to be designated OS.



The mitigation measures to protect sensitive environmental areas are often vague with no real meaning. We suggest the following changes to these policies:

Goal LU-4

LU-4.12 The City shall require new residential development to enhance, restore, and where practical, expand remaining riparian and wetland areas.

LU-4.13 The City shall require that new development on the City fringe to pay the full marginal cost of the development. This will provide economic incentive to for new development within the City center, and around the downtown area, and ensure that new development on the fringe bear its true cost.

Goal LU-6

LU-6.4 The City shall promote riverfront development that reorients downtown to the Napa River and shall encourage creative designs during the development review process that addresses the environmental sensitive, threatened and endangered species, and flood plain characteristics.

Goal LU-9

LU-9.3 The City shall **require** the maintenance of wildlife corridors and **prohibit** the fragmentation of large natural plant communities when environmentally sensitive sites are developed, or mitigate such fragmentation with science-based corridor plans between resulting habitat clusters and other wildlife corridors.

LU-9.4 The City shall **discourage development in high priority** environmentally-sensitive areas and, where this fails, **require** cluster forms of development.

LU-9.5 When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings: (the remainder of this policy remains unchanged)

We wish to emphasize here that these land use goals are very good. However, many are not assigned to implementation programs. The City must provide language to actually implement these goals.

Additional policy changes include:

NR-1.3 The City shall **require** the planting of native plant species in natural habitats.

NR-1.4 The City shall review all future waterway improvement projects (e.g. flood control, dredging, private development), as well as all projects that are within ¼ mile (to account for flood dispersal areas and wetlands) of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also **require** native plantings along the river and creek



banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes, increase between-storm stream flows through greater recharge, provide valuable wildlife habitat throughout the year, and enhance aquatic habitats.

NR-1.6 The City shall require as a condition of approval that development provide protection for significant on-site natural habitat ("whenever possible" stricken). If such habitat cannot be avoided due to demonstrated economic hardship, the City would permit equivalent, science-based, mitigation off-site. In the case of residential development, the City shall perform this review during the subdivision process.

NR-1.7 During development review, the City shall ("endeavor" stricken) identify and protect significant species and groves or clusters of trees on project sites.

#### F. Geology, Soils, and Seismology

The DEIR ignores its own standards and mitigations to justify a finding of insignificance in exposing people and structures to hazards. The DEIR gives a cursory evaluation of hazards to people and property caused by development in high risk areas. The DGP accommodates a cluster of residential development of around 550 housing units and a resort hotel in the Stanly Ranch, an area vulnerable to "very violent" ground shaking intensity from the West Napa Fault. (Figure 8-1A, p. 8-3). DGP policy HS-1.2 is the mitigation measure. However, the policy would "discourage siting of facilities necessary for emergency services, major utility lines and facilities" and likewise discourages "high occupancy structures." (p. 8-2). These are to be discouraged within areas subject to very strong, violent or very violent ground shaking. The mitigation is invalid since the DGP land use designations provide for those very uses on the Stanly Ranch.

Several other areas are given land use designations inconsistent with the DGP policies which are supposed to mitigate for impacts. The "Giovannoni Peninsula", a small spit of alluvium soil in the Alta Heights Planning Area is designated "MU", allowing from 10-40 units per acre, though this soil type is described as most susceptible to liquefaction. The finding that those risks are mitigated to a level of insignificance has no basis.

The DEIR also provides no analysis to support its finding that construction of residential homes on slopes of 30%, as would take place within the RUL expansion area west of Foster Road, can be mitigated by the policies offered in the DGP. We request the identification and analysis of impacts.

#### H. Hydrology and Water Quality

The DGP policy HS-3.9 actually enables increased floodplain development if an adequate and affordable flood control project is not agreed upon by the year 2000. It is not in agreement with the expressed natural resource objectives of the DGP. In fact, it is dangerous. Allowing floodplain development exposes additional life and property to flood

dangers, and irresponsibly increases flood risk down stream. To meet natural resource and health and safety objectives, development in the floodplain must be severely limited and riparian and wetland areas must be protected, restored when possible.

In general, measures to mitigate impacts of the DGP on flooding are inadequate. We suggest the following changes:

- HS-3.2 The City shall continue to apply flood plain management regulations for development in the 100 year flood plain and floodway, **and require that new development show how it will affect downstream flows and flood potential.**
- HS-3.6 The City shall support **alternative** programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that that maintains, to the greatest extent possible, the natural functions of the Napa River using the most cost-effective solutions.**
- HS-3.10 The City shall require that flood control channels be kept in functioning condition. Tree cover on channel banks will be used to control in-channel vegetation growth unless physical limitations or constraints require alternate plans.**

We believe it to be worthwhile to investigate the possibility of combining restoration and flood control efforts. Parks, trail areas, riparian areas, and constructed wetlands could all serve as temporary relief basins or wide outs to slow flood waters and prevent flooding down stream. Golf courses may be used in a similar manner.

### III. CONCLUSION

The Sierra Club Napa County Group finds that the public process used to develop the DGP makes a good-faith effort to attain the environmental and quality of life goals as stated in the DEIR. However, the DEIR will not allow the community to reach these goals. We reach this conclusion by noting that the DEIR:

- does not adequately identify and analyze impacts of the DGP;
- mitigation measures are often inadequate and vague; and
- fails to review potential impacts of the Stanly Ranch development proposal.

In essence, mitigation measures in the DGP are so indeterminate and the DEIR so abstract that we can not agree with the DEIR when it states that there are not significant impacts anticipated from adoption and implementation of the DGP due to the self-mitigation nature of the DGP. (p. S-4).

We urge the DGP to be revised to avoid heavy mitigation and to develop a true "confined city policy" that also protects and restores wildlife habitat within the city.







# NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559  
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON  
Executive Officer

GENERAL PLAN COMMUNICATION # 15

November 18, 1996

Deborah Faaborg, General Plan Project Manager  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559



Subject: Comments on the Draft City of Napa General Plan  
Environmental Impact Report

Dear Ms. Faaborg:

This office acknowledges receipt of the City of Napa General Plan Draft Environmental Impact Report. Based on review of the draft document, the General Plan Project may require sphere of influence amendments and subsequent annexations of land to the City and the Napa Sanitation District. Accordingly, the Napa County Local Agency Formation Commission (Commission) is a Responsible Agency under the California Environmental Quality Act (CEQA).

The enclosed comments on the Draft EIR are submitted at this time to comply with CEQA timelines and the response deadline of November 18, 1996 provided in the Notice of Completion attached to your October 3, 1996 transmittal letter distributing the Draft City of Napa General Plan and EIR. Notwithstanding this submittal, the Commission is scheduled to review the proposed City General Plan at its December 11, 1996 meeting. It is very likely that additional comments on the draft plan and environmental documents will be forwarded to the City as an outcome of the Commission's review.

## DRAFT EIR COMMENTS:

With the exception of the Stanly Ranch Planning Area, the Draft EIR adequately evaluates the environmental impacts and mitigation measures relating to issues under the jurisdiction of the Commission.

## STANLY RANCH - PLANNING AREA NO. 12

The Draft EIR fails to assess adequately the environmental aspects and impacts of the proposed urbanization of Napa Planning Area No. 12, Stanly Ranch. The proposed General Plan designates this area for urban uses including not only **Tourist Commercial** but also **Single Family Residential and Single Family Infill** providing for up to 600 residential dwelling units. (Ref. Fig 1-15 and Table 1-4). The following environmental impacts of these proposals need to be analyzed fully in the Draft and Final EIR:

### Loss of Agricultural and Open Space Land

The Stanley Ranch area containing approximately 928 acres is currently developed with agricultural and open space uses including over 100 acres planted in vineyard. The conversion of agricultural and open space land to urban uses is an unmitigated environmental impact which should be discussed in the EIR.

### Growth Induction:

The proposed urbanization of the Stanley Ranch area including the extension of urban infrastructure and public services should be evaluated for its growth inducing impacts to adjacent land in agricultural and open space use. In this regard, over 800 acres of unincorporated land in agricultural and open space use lying between the Stanley Ranch and the existing City urbanized area to the north would be substantially surrounded by the City, inducing further development of these lands.

### Cumulative Impacts

Page 1-7 of the Draft EIR makes reference to the preparation of a specific plan for the Stanly Ranch area. It is unclear whether a specific plan or conceptual plans have been filed and not completed for the Stanly Ranch area or whether the development described as "Preliminary conceptual plans" was used as a basis for environmentally assessing the development of the Stanly Ranch. If a specific plan or conceptual plan has been filed for the Stanly Ranch area, the General Plan Draft EIR must evaluate the environmental impacts associated with that development for cumulative impacts.

### Alternatives Section

The Alternatives Section should evaluate the re-designation of the Stanley Ranch Area to an agricultural or open space designation. A second consideration for analysis is the detachment of this isolated "cherry stem" area from the City.

### Compatibility with Adopted Plans:

As noted in the Draft EIR, the Stanley Ranch area is located outside of the Commission's adopted sphere of influence for the City of Napa. Please also note that the Stanley Ranch area is located outside of the Napa Sanitation District Sphere of Influence and District Boundary. As a result, practical implementation of the proposed plan for the Area will probably require approval by the Commission of adjustments to these spheres and boundaries. Because such approval by the Commission must be consistent with the following Government Code provisions pertaining to the Legislative Intent and Purpose of the Commission, the Draft EIR should discuss the consistency of the proposed urbanization with these constraints upon the Commission's discretion:

#### **§ 56300. Legislative intent**

It is the intent of the Legislature that each commission establish policies and exercise its powers pursuant to this part in a manner that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space lands within those patterns.

#### **§ 56301. Purpose and object of commission**

Among the purposes of a commission are the discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies based upon local conditions and circumstances. One of the objects of the commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local agencies in each county and to shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities.

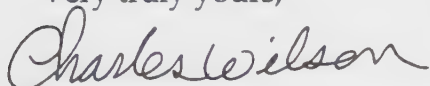
15.2



Deborah Faaborg, General Plan Project Manager  
City of Napa Planning Department  
November 18, 1996  
Page 4

On behalf of the Napa County Local Agency Formation Commission, I would like to extend the Commission's appreciation of the opportunity to comment on the City of Napa General Plan Draft Environmental Impact Report.

Very truly yours,

A handwritten signature in cursive script that reads "Charles Wilson".

Charles Wilson  
Executive Officer

cc: Chairman John Brown and Members of the Commission  
Margaret Woodbury, LAFCO Counsel

DRAFT EIR COMMENTS

TO THE DRAFT POLICY DOCUMENT  
GENERAL PLAN 2020



C O M M E N T S-transportation

The draft EIR is lacking in its response to the draft policy document in the element of transportation. The draft policy document suggests that mass transportation should be developed but does insignificant planning for it.

1. Existing Conditions described in the DEIR pg. 3.3-1 states that transportation systems are built out to their '*maximum requirements in most locations*'. In chapter 3 of the draft policy document, pg. 3-1 it states '*do more with less*'.

16.1

2. The draft EIR (and the draft policy document) discusses future roadway improvements on page 3.3-7. Eighteen different road improvements are listed. Item #17 is the widening of Imola between Soscol and Coombs to four lanes. This would involve the Maxwell Bridge (aka Imola Bridge). The financial cost and environ-

16.2

16.2↑

mental impacts are not discussed at all.

3. The draft EIR supports the DPD to develop a viable funding source to implement the above 3.3-7 future roadway improvements. The draft policy document and the draft EIR recommends a street utility assessment district (see DEIR pg.3.3-9)

DO WE NEED ANOTHER ASSESSMENT DISTRICT

DO WE NEED MORE PAVEMENT-MORE FLOODING DUE TO INCREASED HARD SURFACES

DE WE NEED TO KEEP GIVING UP PRECIOUS LAND FOR PAVEMENT?

DO WE WANT INCREASING AIR POLLUTION?

DO WE NEED MORE MAINTENANCE COST ON ROADS THAT CONTINUALLY BLOW-OUT, WASH OUT AND ERODE. ROADS ARE A CONTINUOUS TAX BURDEN WITH NO RELIEF TO THIS DILEMMA IN THE NEAR FUTURE.

The draft EIR says little about these important environmental issues because the draft policy document does not discuss these issues. Therefore, the draft policy document is lacking. Since it is lacking, the solutions are lacking and not discussed.

16.4↓

4. The city is to consider (the draft policy document on page 3-28 under policy T-10.4)



possible future transportation uses of existing rail right-of-way.

One possible solution is a SKY-TRAIN idea. Vancouver, Canada built a sky-train for the worlds fair on transportation and it serves has an efficient, timely and convenient form of transportation.

Mass transportation would:

REDUCE THE NEED TO CONTINUALLY ENCROACH ON AGRICULTURAL LANDS

CREATE A POSITIVE AMENITY TO THE TOURIST INDUSTRY

BRING NAPA SUCCESSFULLY INTO THE 21ST CENTURY

PROVIDE FLUID TRANSPORTATION TO RESIDENCES WITHIN THE CITY AND THE COUNTY.

WITH THE DECREASED USE OF PAVEMENT THERE WOULD BE INCREASED WATER FILTRATION THAT WOULD HELP PROMOTE HEALTHY GROUND WATER TABLES

THE TIME IS NOW TO CONSIDER THAT THE DRAFT POLICY DOCUMENT DOES LITTLE TO STATE A CLEAR POLICY AND IMPLEMENTATION FOR MASS TRANSPORTATION AND AGAIN THE DRAFT EIR IS LACKING.

16.4



GENERAL PLAN COMMUNICATION # 17  
**Response To The Draft Environmental Impact Report**  
**by**  
**A Committee of Concerned Citizens**



This is a brief comment on the Draft Environmental Impact Report, in preparation for a more in-depth comment on the Draft General Plan. We first want to commend that the proposed revision maintains key elements of the current General Plan such as containing growth within the RUL, conserving the characteristics of existing neighborhoods and preserving and protecting natural resources. However, there is much within this report that generates more questions than it provides answers. It creates a vision of what the future may hold with respect to what life in Napa will be like that may not be consistent with preserving the “small town” image of Napa.

We refer to two items within the report:

1. Residential development of the Stanley Lane area within the RUL.
2. Future roadway improvements (Table 3.3-3, p.3.3-7).

**Stanley Lane**

The report does not adequately describe the effects of development on two important features of the area. One is the “gateway view” of Napa entering over the Southern Crossing or by way of SR 121 from Sonoma County. Not only is there the view to protect but the floodplain area and wetlands. Secondly, there was inadequate discussion of the fact that this area has limited access and would seem to require improvement of the existing road, Stanley Lane. There was inadequate discussion of the ability to provide fire and police protection to this area. The report was too sketchy in general with regard to development in this area. This is a controversial portion of the General Plan and it is somewhat suspicious that so little is revealed.

17.1

**Future Roadway Improvements**

In examining this table of information, again more questions come to mind than are answered. For example, a disquieting vision arises of what the adjacent area will look like when contemplating a widening of the First Street Bridge to four lanes or the widening of Imola Avenue to four lanes between Soscol and Coombs Street. The report states: “Overall, Napa’s streets are relatively uncongested.” Isn’t this what we want to maintain? The question arises about what development should we allow to maintain this condition of uncongestion. Does the widening of streets also invite more traffic and subsequent development? Shouldn’t it be a goal that to maintain our “small town” character, we strive to control the amount of traffic that flows through our town?

17.2



## **Committee of Concerned Citizens**

Josephine Jenkins

Linda Sager

Carol Whichard

Bridget Thornton

Michele & Fred Smith

Keith Carter

Nancy & Jeff Booth

Judy Heys

Pam & Gary Greco

Betty Hopperstad

Jacqui & Richard Murray

Lynn & Ron Mullins

Sue & Roy Rosselli

Cynthia Knight

Lori Pesavento

David Kramer

Judy Nelson

Sherry Kingsley

Trudy Elm

Candace Peterson

Cathy Parker

Betti & Bill Frintner

Brenda Adams

Diane Fisher

Pat Howard

Cindy Black

Ana Kawakowski

Nevidida Glace

Lori Townsend

Teresa LeBlanc

## GENERAL PLAN COMMUNICATION # 18

November 18, 1996

City of Napa  
Planning Commission

Napa, CA 94558

To Whom It May Concern:



I am writing to object to the passage of the Environmental Impact Report for the City of Napa's "proposed" General Plan of development sited for the next 20 years.

In the first place, this report did not have the proper public forum for discussion. It was scheduled last on the agenda several weeks ago at 10:30pm, when several interested parties could not stay because of the late hour. When a few folks complained about this the next day, the proposed E.I.R. was placed on the agenda for public critiquing the following week, but according to Chris Malan's commentary in the Napa Register, 11-12-96, most people who were present at the first hearing did not know the hearing was extended and did not show up to participate.

18.1

My biggest objection against passage of the E.I.R. is that it is premature to pass an E.I.R. on a General Plan that is only a proposal and has not had the scrutiny for public discussion about it's scope, expense and how it will be funded.

Passage of the Environmental Impact Report before the passage of the General Plan itself does not seem reasonable or cost effective. I understand many on this committee have put a lot of time and effort into these proposals which is appreciated. However, the growth of our still quaint little 'rural city' must be moderate and publicly understood, if possible.

18.2

Thank You.

*Susan Levine-Roust*

Susan Levine-Roust  
2341 Joanne Circle  
Napa, CA 94559  
(707)226-3975

SLR/gjmp





November 18, 1996

GENERAL PLAN COMMUNICATION # 19

John Yost, Planning Director  
 City of Napa, Planning Department  
 1600 First Street  
 Napa, Ca 94559-0660



RE: Comments on City of Napa General Plan Draft EIR

Dear Mr. Yost

I am writing to comment on the City of Napa General Plan Draft EIR, specifically that area North of Trancas and Redwood Road. My major concerns are:

1) With the recent and continued development in the North and North-Western areas (#1, Linda Vista and #2, Vintage) of the City of Napa, where is the storm water being diverted and where will it be diverted in the future? Where are the open space areas located within North Napa (#1, Linda Vista and #2, Vintage) that are and will be available for ground water recharge? How much will the proposed "Plan" add to the flooding that already occurs in the neighborhoods?

19.1

2) It was my understanding that the BRRSP would supersede the General Plan, has this changed? At the recent city council meeting (October 22, 1996) with the adoption of the BRRSPA plans, it was my understanding that Sierra Ave and Garfield Lane, as well as, Villa Lane at Garfield Lane would not be connected, however, the General Plan Draft EIR (Table 3.3-2 page 3.3-5) shows that the City plans "future intersections" at these locations; can these errors be corrected? Again, "Future Roadway Improvements" of Table 3.3-3, listed on page 3.3-7, # 3, #4, and #5 were all rejected; why then, are they still listed within the City of Napa General Plan Draft EIR? It was my understanding that Sierra Ave would no longer be considered a Collector (Table 3.11-2, page 3.11-8), shouldn't this change be noted in the EIR? Won't the figures noted in the this Draft EIR particularly sections 3.3 and 3.10 need to be adjusted to the changes noted above?

19.2

3) I continue to have strong concerns concerning our natural resources and the bio-diversity of life that depend on the habitat provided for them in and along the Salvador Channel. I have observed a variety of plants and animals that are of special concern to me. Throughout the year there are continuous and changing cycles of life that feed and or reproduce in the area.

There are a variety of trees most significantly the Valley Oak (*Quercus Lobata*) and the Black Walnut (*Juglans Californica*) that reproduce in and around the area. There are open spaces suitable for the replenishing of native grasslands.

There are a variety of raptors (kestrels, falcons and hawks) that feed in the open fields, egrets and kingfishers that feed along the waterway, both the unusual Great Blue Heron and the Green Back Heron that feed and nest within or along the creek, the unusually small titmouse, reed warbler, and flycatcher that live amongst the reeds and / or willows, as well as, the more common varieties of birds (finches, hummingbirds, jays, orioles, owls, pigeons, quail, ravens, robins, sparrows, vultures, warblers, woodpeckers, and others too numerous to mention).

19.3 Currently, the Salmon are migrating up the Channel, the steel head trout will be here within a few months. There are freshwater clams, craw dads, frogs and the Western Pond Turtle that use this waterway, both the California Slender Salamander (*Pacificus attenuatus*) and the California Newt (*Taricha torosa*) breed within the creeks domain.

There are a variety of insects (such as water beetles, butterflies, and dragonflies) that are endemic, or use the plants along the waterway as their host plants.

Before approving the Draft EIR for the City of Napa General Plan, why can't the city explore the possibility of keeping an area open within its boundaries for seasonal wetlands? This area has a multitude of uses that will not be mitigated within the RUL. It seems that this area is of significant value to be preserved for wildlife, nature study and seasonal wetlands. Couldn't an area such as that located between the Salvador Channel and the Gasser tributary be used in a combination floodplain and / or flood-water retention basin?

4) Who are the 19 members of the Citizen Advisory Committee (CAC), and are any of these members residing (living on a daily basis) within the Big Ranch Road area? [see S2 and Appendix A, Envision NAPA 2020, page 1]

19.4

Many of my other concerns are in understanding how the city will meet it's goals or objectives in the development of this General Plan: I do not comprehend how you are meeting the seven project objectives in North Napa.

How does an approximate 50% increase of the dwelling units (and therefore population), the change in zoning from County to City...or both the minor and major expansions of the RUL, the loss of the remaining open space, the storm water runoff diversion to the Salvador Channel...which is already past capacity, and the loss of habitat (that which will be damaged and eliminated) meet these objectives? How is the character of my neighborhood maintained?

How does this improve the job /housing market (Aren't there already more homes on the market then people available, or with the means, to purchase them? Aren't there already more people out of work then jobs available to them? )? Even in the construction industry aren't the jobs only short-term, once the homes are built the job is done?

19.5

If we recognize Napa's precious natural resources why do we ignore those within the City Limits? How does diverting more water into the downtown area (via the Salvador Channel) during times of flooding seek to "maintain a vital and healthy Downtown" ? With the high environmental loss and monetary cost due to flooding, why do we seek to cause a greater impact rather than to prevent , while we still have the opportunity? [S3. on page S-2 and again on pages 2-4 and 5-1]

Will you explain how the City of Napa's Goals listed on pages 2-5 to and including 2-9 are met? Isn't A-1 the only possibility? How can these goals be met in North Napa by the proposed increase of the population of this area (#1, Linda Vista and #2, Vintage) in less than 25 years?

Page 2-14 Does the figure of the 1,611 additional dwelling units inclusive of those approximately 843 units of the Big Ranch Road Specific Plan Area recently approved by the City Council or, are they in addition to those 843 units?

19.6

Page 3.4-2 and 3.4-3 It was my understanding that neither the water nor the

↓ 19.7



19.7

NSD issues had as yet been determined; can you explain to me when these issues were resolved and implemented?

19.8

Page 3.7-2 to 3.7-3 What is the location of the retained grasslands within the Napa City limits or RUL line? How much property is this? And, what percent of the total land within the RUL does this property represent?

19.9

Page 3.7-3 to and including 3.7-9 Why is it not possible to retain enough open space and habitat to sustain our plants and animals (so that they can actually perform all of their biological functions, such as to eat and reproduce, not only a minimal effort so that they can be seen by us on an occasion)?

19.10

Page 3.9-1, under section 3.9 titled Hydrology and Water Quality, the flood event of 1993 and those of 1995 are not addressed, why? How has the development and in fill that has occurred since 1986, impacted those in the neighborhoods and downstream of such developments? How have these events changed this EIR and what laws or regulations have changed since February of 1986 and March of 1995 that may impact this report? If the last remaining agricultural lands within the RUL which are where ground water is replenished and saturation occurs, or land remains under water for days or weeks, and development is to occur, where is this water expected to go?

19.11

If flooding occurs when the Napa River at Oak Knoll Avenue exceeds about 15,000 cubic feet per second, isn't it tenable to expect that at about that same time, the flood waters from Salvador Channel will be joining the Napa River just north of Trancas Street. Since, the largest increase in development, within the RUL, is expected to occur North and North-West of this location, and the only available drainage is the Salvador Channel, my question is: "how will these waters avoid contributing to the flooding of downtown Napa"? If there are significant impacts already noted in the Big Ranch Road EIR Draft (pages 92-97), even prior to the approved 843 homes, how then can the significant criteria mentioned on page 3.9-2 of the general plan's Draft EIR be expected to be met with an additional 2,888 housing units developed in North /North-west Napa?

19.12

How will participation in FEMA'S insurance program lessen the occurrence of flood or protect those living in a development (once it has occurred) during a flood event? Does this insurance prevent the residents from going through the stress that occurs during loss of home or the trauma that occurs when faced with the possible loss of ones life? Does our city have some preventative measures that the general

population is not aware of during "Acts of God"? Isn't there a FEMA law that prevents us from building in an area that we know will flood, or a law that prevents a developer from protecting his properties by knowingly causing his neighbors, or those down water, to flood in the future?

19.12

Page 3.9-3 Who is the authority that has told the city that there will be minimal storm water runoff with the development suggested by the general plan? How can there be minimal runoff volumes added to the City's storm water drainage system in the North Napa area if there is at least a 50% increase in homes? Have our city experts consulted with any national acknowledged authority? If the problems in this area are minimal why hasn't the city been able to take care of the runoff in the past?

19.13

How many of the 1,037 acres that are slated for development are located in the North/ North-West Napa areas? Along with the approximate 215 acres that are planned for development in the BRRSPA, how many acres of land total will be drained into the Salvador Channel that is already past capacity?

19.14

What percent of the 426-square-mile watershed that is drained by the Napa River is being left open for seasonal wetlands? What acreage and what percent of the approximate 1.62 sq. miles of remaining acreage left within the RUL is to be left as open space or seasonal wetlands? What is the total acreage, and thereby total percent of the property within the RUL being left as open space / seasonal wetlands and floodway / floodplain? If there are no properties being set aside it would seem that "0.0038 percent" located within the RUL is not enough, or is it less than what is minimally needed? How can these issues possibly be mitigated within the RUL if there is no other property available?

19.15

Page 3.9-3 Why isn't the Salvador Channel acknowledged as a natural drainage way within the RUL? Even though the city has attempted to contain this channel within the cement pipes and cement ditches from west of Hi 29 through Vintage High School, the channel retains much of it's natural flow South-East of Vintage to the Napa River. How has the City enhanced this water way in the past? How does it propose to enhance it in the future beyond the ability of "God" or "Mother Earth"? If the Plan wanted to protect the habitat from incompatible urban uses (3.9-4) wouldn't it refuse to develop knowing that the riparian habitat along the river or it's tributaries would be destroyed and acknowledging that no mitigation measures will make up for this loss?

19.16

Page 3.10-2 How can the General Plan draft EIR claim that VMT is lower than

19.17

19.17 ↑ that rate of increase in population when it is based on a projection? Can you clarify this?

19.18 Page 3.11-2 under the heading "Major Arterials" Soscol Ave - Silverado trail to Trancas, why is the Average Vehicle Speed listed as 35? The posted speed limit is 40 MPH. Under "Minor Arterials" Big Ranch Road -Trancas to northern city limits, why is the Average Vehicle Speed listed as 30? The posted speed limit is 50 MPH. The average speed is often above that posted, or are these speed limits that are proposed for the future?

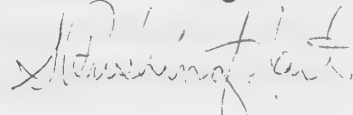
19.19 Page 3.11-8 Isn't Sierra Ave ~~is~~ no longer considered a collector St. ? If so, then how will this affect the surrounding streets?

19.20 Page 4-1 I do not understand how there can be no Significant Unavoidable Adverse Impacts associated with the adoption and implementation of this document when there have been several noted in the BRRSPA plan; this document has a substantial increase of homes; how can this be so?

19.21 Page 4-2 How will the Napa Valley be known around the world, after the open space resources are depleted? Why doesn't Napa City retain some open space within it's limits? We constantly compare our county with those neighboring us, Sonoma County to the west and Solano County to the south and east. Yet those counties are much bigger, we are much smaller, we are unique and shouldn't even try to compete. If we plan to increase our dwelling units by 15,500 in less than 20 years (80% which will be located within the city limits) or over 30% of our total, then will we again extend our RUL in 2015?

19.22 Page 4-3 ,Table 4-1, Why is there a difference of 6,000 people between what the City of Napa (Draft general plan), lists as the population of 1990 and what the City of Napa (ABAG), lists as the population in 1990? What was the actual population in 1990, and what is the actual population now?

Susan Rushing-Hart



73 Garfield Ln.

Napa Ca. 94558

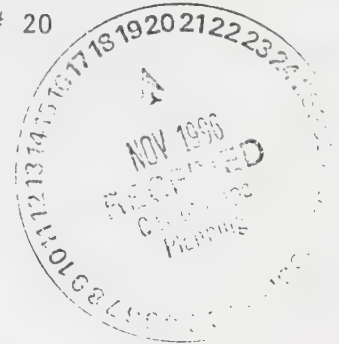


JOAN AND JOHN RUTHERFORD 88 VALLEY CLUB CIRCLE NAPA CA 94558 707.224.0217

November 16, 1996

GENERAL PLAN COMMUNICATION # 20

Mr. John Yost  
Planning Director, City of Napa Planning Dept.  
P.O. Box 660  
Napa, CA 94559



Dear Mr. Yost:

I am heartened by the conservative nature of Napa's Draft Environmental Impact Report, however: During our very first Napa Planning Commission Meeting, several months ago, a Mr. Marks commented, concerning a very large Napa development, that said development would not deal with negative water, sewer, flooding or traffic impacts on the adjacent community. As newcomers to Napa, Joan and I were, to say the least unbelieving as that very development became a reality. So, you see . . . Until the general plan deals with such a threat to our lifestyles, safety and real estate values, there is no general plan.

20.1

Sincerely,  
John Rutherford

A handwritten signature in cursive script, appearing to read "John Rutherford".

cc: Napa Valley Register





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EQUAL HOUSING  
OPPORTUNITY

November 15, 1996

GENERAL PLAN COMMUNICATION #21

Mr. John Yost, Planning Director  
City of Napa  
Napa, CA

Dear Mr. Yost:

As you know, we are currently reviewing all the documents related to Napa's General Plan update. And, as hearings on them before the City Council are set, we plan to share specific observations.

However, we feel the need to make a general observation now, before the comment period on the EIR officially closes November 18. Your plan does a worthy job of attempting to balance the multitude of competing factors – from economic realities and housing needs to environmental issues – which face any community. However, the scope of the plan is based on what we believe to be a faulty premise: it anticipates growth slowing almost to nothing as Napa achieves "build out."

In our opinion, the entire issue of "build out" needs more thorough examination, especially as it becomes a factor in the city's economic well-being. We believe that the presence of an inflexible rural urban limit line mandates higher densities – at least in selected areas – than the current EIR and Plan now project. We believe more potential areas of MU zoning should be added. And we believe the entire notion of feathering toward the RUL should be examined in light of not just short term needs but Napa's long-term economic health.

We fully support the Chamber of Commerce call for development of a separate Economic Element. And we recommend land use projections be included in the subset of factors analyzed by this new Element.

Thank you for this opportunity to comment. We look forward to participating further in this most important dialogue.

Sincerely,

Lisa A. Marsey  
Napa Chapter President

NORTH BAY ASSOCIATION OF REALTORS® SERVING NAPA • SONOMA • MENDOCINO



21.1

21.2





COPY

22.

GENERAL PLAN COMMUNICATION #22

November 18, 1996

City of Napa Planning Commission  
% Planning Department  
1600 First Street  
Napa, California 94559

Re: Comments on the Draft General Plan  
Environmental Impact Report

Dear Planning Commission:

I am writing on behalf of my family and neighbors in Liberty/Sage neighborhood.

We are writing to comment on, and object to, the General Plan Environmental Impact Report which indicates that a connector street should be put through in a form of an extension through Souza Lane - east to Capitola Avenue. We specifically refer you to page 3.3-7, Item No. 12 and page 3-11, paragraph T-1.9b of the Draft Environmental Impact Report.

We believe that the Souza Lane extension would have a negative impact on our area, due to increased traffic flow through the area, and would fail to create any significant benefit for the broader Terrace/Shurtleff area.

A small group of us visited the Public Works Department to discuss with them our understanding of the environmental analysis that was done for the Environmental Impact Report. It was stated in that meeting that the reason for the Souza Lane extension was to add to a connector street from one part of this area to another. In other words, to increase traffic flow throughout this area. We question the basic premise that this is necessary or that it would be desirable and beneficial to most residents.

The Public Works Department indicated that "no one wants connector streets to go through their neighborhoods." If that is the case then the basic concept of putting through connector streets, so that traffic flows through in every area of the city, needs to be reevaluated.

22.1

22.1 We believe that people throughout the city are saying that they are willing to put up with the traffic on the bigger streets in order to preserve the sanctity and closeness of our neighborhoods. The citizens of this city are in favor of slow growth. The citizens of this city want peace and quiet. We live out in the country. When you make that choice you are saying that you are willing to accept the minor inconveniences of waiting a little longer for a traffic light to change on a major street in order to keep traffic slower closer to your home.

The Police Department and the Fire Department may say that response time will be improved by the Souza Lane extension through our area. We do not believe this to be so. This is clear from talking with firefighters who drive the fire trucks and our own neighbor who is a California Highway Patrol Officer. They say that in an emergency they would very likely use the Coombsville Road to Terrace Drive path in order to get to our neighborhood or the surrounding neighborhoods most expeditiously. The Souza Lane extension would only minimally improve access. In the five years our neighborhood has been in existence we have never seen a true emergency occur. We do not believe that there has been a single fatality or serious problem in our area that having the Souza Lane extension would have made a difference to, in terms of response time.

The planned Souza Lane extension is even more concerning when we look at the Altamura project that has been proposed. The Altamura project would, at this point, require a cul-de-sac at the end of Liberty Street. This would necessarily mean that Sage Way could become the connector street for the Souza Lane extension. This was never the intention when the Souza Lane extension was originally proposed. In fact, Liberty Lane was to be the connector street; it was built wider for that purpose.

The serious hazard to all of the children on Sage Way would be greatly exacerbated by turning Sage Way into a connector street which is a danger at this point due to current Planning Department stand on the Altamura subdivision as it is currently configured.

We do not understand why the Planning Department wants to destroy the closeness of our neighborhood by putting connector streets through our neighborhood that necessarily increase traffic and which is a hazard to our children.

Many people who come to our neighborhood immediately get a sense of the well-being and warmth generated by the caring we all feel for each other. We urge you to reconsider your position on the Souza Lane extension.



City of Napa Planning Commission  
Re: Comments on the Draft General Plan  
Environmental Impact Report  
November 18, 1996  
Page -3-

In our minds, the City's desire to add one more connector street by way of the Souza Lane extension does not justify the devastating negative environmental impact it would have on our neighborhood.

↑ 22.1

Very truly yours,

**Cathy A. Zeller**

Cathy Zeller, on behalf of  
Jeff Erickson  
Peter Glass  
Donna Glass  
Holly Blackney  
Rick Blackney  
Jeff Dunlap  
Anne Dunlap  
Tom Pierce  
Pam Pierce  
Leslie Walder  
Mark Walder  
Eleanor Bartlett  
Bill Bartlett  
Robert Glass  
Janet Wagner  
Ben Livsey  
Clara Livesey

cc: Brad Wagenknecht, Mayor  
Cindy Watter, Council Member  
Joanne Busenbark, Council Member  
Harry Martin, Council Member  
Jill Techel, Council Member  
John Yost, Director - City of Napa Planning Department  
Mike O'Bryon, City of Napa Public Works Department  
John Draper, City of Napa Public Works Department



John Yost, Planning Director  
City of Napa Planning Department  
PO Box 660  
Napa, Calif 94559

Nov 18, 1996



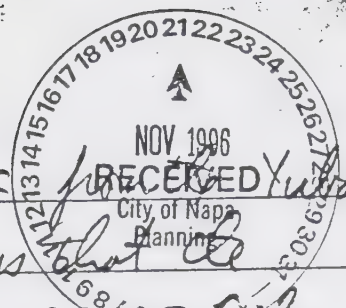
City of Napa General Plan Draft E.I.R.

The Draft E.I.R. states on page 3.4-2 that Napa's water demands are met by 3 sources, Lake Hennessy (31,000 A-F), Milliken Reservoir (1,980 A-F with 1,200 A-F a dependable yield, and the State Water Project (18,800 AF with 45% of that a dependable yield or 8,460 A.F.) I talked to Don Ridenhour, City Water Manager, and he said Lake Hennessy had a dependable yield of 5,000 AF. This information is tabulated below

Water Source	Best	Dependable	23.1
	Possible Yield	Yield	
Lake Hennessy	31,000 AF	5,000 AF	
Milliken Reservoir	1,980 AF	1,200 AF	
State Water Project	6,200 AF (1996) - 18,800 (2021)	2,790 AF (1996) - 8,460 AF (2021)	
	38,180 AF (1996) - 51,780 (2021)	8,790 (1996) - 14,660 AF (2021)	

The Draft Policy Document states the current entitlement from the State water project is 6,200 AF (pg 4-11) & it isn't sufficient





↑  
since the City had to buy 6,500 AF  
County Water Agency. The EIR, says that the  
current normalized demand is 13,550 AF. (The  
Draft Policy Document says on page 4-18 that prior  
to the drought, Napa's peak annual demand had  
been 14,400 AF.)

23.1 The bottom line is that the year 1996 dependable  
yield is 8,790 AF and this doesn't satisfy the  
1986 peak annual demand of 14,400 AF & the current  
normalized demand of 13,550 AF. This is all  
obvious to the normal water customer since  
we all had to go on rationing & let our  
lawns, gardens etc die. When the dependable  
yield rises to 14,660 AF in 2021 it will barely  
satisfy the current demand, much less the year 2021  
demand of 16,569 AF (EIR page 3.4-2.)

The City shouldn't be allowing property to be developed  
when there isn't sufficient dependable yield  
water for the existing customers. The City should  
not resort to rationing to meet the water needs as  
this causes existing customers to have to replace their  
landscaping after a drought, at considerable cost.

Sincerely,  
Dennis Schreyer

# Friends of the Napa River

1

24.

The Landmarks Building  
1026 First Street • Napa, CA 94559  
Phone (707) 255-8646 • Fax (707) 255-2164

GENERAL PLAN COMMUNICATION # 24

**FROM: FRIENDS OF THE NAPA RIVER**  
**TO: THE CITY OF NAPA, CALIFORNIA**  
**RE: ADDITIONAL WRITTEN COMMENTS ON THE**  
**DRAFT ENVIRONMENTAL IMPACT REPORT AND**  
**DRAFT GENERAL PLAN POLICY DOCUMENT**

December 2, 1996

## **A: INTRODUCTION**

Our major concern, as "the community's voice for the Napa River and its watershed," is the Napa River, its healthy future and its healthy integration into the fabric of life and culture in Napa Valley. These comments constitute an addition to our brief written submission to the General Plan hearing October 17, 1996, a submission which included Guidelines for the Urban Riverfront. We appreciate the extension of time granted so that we could make a more considered evaluation of the documents.

We understand that, technically, we should be addressing only those elements included in the DEIR. But because the self-mitigating nature of the Draft Policy Document excludes any reference in the DEIR to any element whose impact is deemed insignificant, the DEIR is a sparse source of opportunity for comment on the Napa River. The Draft Plan is, in effect, a DEIR. We are, therefore, addressing both documents.

In summary, we welcome the generally enlightened and sensitive approach taken to our community's fundamental struggle between growth and protection of natural resources and quality of life. We see many of the policies which Friends of the Napa River has espoused over the last several years incorporated into Envision 2020. The documents also substantially reflect the recognition that an economically and socially successful future for the City of Napa and the Napa Valley lies in aggressive protection of natural resources such as rivers and streams, hillsides, agriculture, plant and animal habitats, and open space. We endorse the policy of adopting Best Management Practices (BMP) as a standard to assure this protection.

We see some planning lapses and omissions, however, which we wish to address:

24.1



**: The Napa River is not given sufficient focus and attention to reflect its potential importance to the future of the City of Napa.** True, the river is referred to as "a natural corridor and recreational spine connecting neighborhoods and providing a focus for downtown," as "an integral part of the city's identity," and its downtown riverfront as "an untapped but potentially powerful aesthetic resource." The Plan also states, as policy, that "the City shall promote riverfront development that reorients downtown to the Napa River..." But references to the City's plans for the river are so scattered throughout the document that any hope the document may have had of transmitting a policy of making the river central to Napa's future is thoroughly diluted and diffused. and the DEIR, in its Overview: Project Objectives (p S-2, S3, Nos. 1-7) does not even mention the river.

This absence of focus is all the more dramatic as we study the new river Area Plan for Petaluma, a neighboring river city which recognizes that "river planning is central to Petaluma planning... the core of any General Plan for Petaluma." Its published river plan is thicker than Napa's entire General Plan Policy Document! Petaluma -- with numerous other American cities from New York City to Boise, Idaho -- recognizes what Napa knows but has not yet found the means to adequately and clearly express in its General Plan: that a fine, beautiful and healthy river running through the heart of a city is the key to a dynamic socio-economic future.

24.2 Several of our concerns rise from the fact that the Citizen's Advisory Committee (CAC) and the Planning Department did not have access, during the 1991-93 planning phase, to two major river events which have altered visions and planning for the Napa River, namely, 1) The Community Coalition's Flood Management Plan now moving towards completion, which brings a wholly new multi-objective, "living river" philosophy to solving flood issues, and 2) the American Center for Wine Food and the Arts (CWFA), whose site on the Oxbow shifts the 'center of gravity' for a revitalized downtown riverfront district. The Plan does admirably in trying to integrate the two after the fact but, because of their importance, the Flood Plan and CWFA must have more thorough and carefully considered treatment in the final General Plan.

In broadest terms, we recommend that the General Plan bring more focus to four central themes as regards the Napa River:

1: **The "living river" theme** must run through all planning goals for the river.

2: **The vision of a vibrant urban riverfront** -- one in harmony with the community's character and the river's health -- is the key to the stable revitalization of downtown Napa.

3: **The dual goals of the flood management approach to the flooding issue -- flood protection and the restoration of the river and its watershed** -- must be endorsed.

4: **The need to recognize the river's unique importance in the General Plan by making it a distinct and separate Subject Area**, joining the eight already identified.



As introductory comment, too, we found many policies, implementations, and mitigations far too vague and ambiguous; we found the treatment of alternatives to be confusing and incomplete. Just one example: The development of alternatives to a flood plan are totally inadequate (Draft Plan p 8-13, HS-3.1 to 3-9). We will make more specific comments on that below.

24.3

A general concern we have is that the General Plan not be overridden by City Council and Planning Commission, and that its policies **be implemented**. Our concern was recently raised by both bodies overriding in the Big Ranch Road Specific Plan the stated policies of the Draft Policy Document (See Policy Document p 7-4,5; p 8-13, HS 3.6). Although it is not yet a formal document, is the City committed to its policies and principles?

24.4

## B: GENERAL COMMENTS

We have four general proposals by which the General Plan can achieve the above four theme goals:

**1: Create a separate Subject Area element for the Napa River** which consolidates the Plan's several references to the importance of the river and state that goal very clearly. Even a cursory study of the experience of other American cities will reveal that a healthy and sensitively restored and developed urban river is the single most powerful force in 'turning around' a "deteriorated" and "blighted" downtown, in increasing property values all along the river, and in providing an incomparable recreational and spiritual resource for an entire city. It is a galvanizing force for pride, and a lure to visitors. But the city must make a clear and specific commitment to the central role of the river. Specific references to the river should remain where they are, scattered through the Plan, but the major goals, policies and implementations must be centralized.

24.5

To support the centrality of the river to the City of Napa's future, several things must be built into the General Plan:

**2: A Specific Plan** for the urban reaches (Planning Areas #8 and #9), and **New Land Use designations for a 'river corridor'** running from north to south of the city's boundaries.

The proposed Land Use designations simply carry the neighborhood uses out to the riverbanks -- much is very loosely designated Mixed Use, with no consideration of the need for special planning along the river corridor so that the land uses are appropriate to the restored "living river" which will be created by the flood management plan -- uses which could not have been envisioned by the CAC. For example: the removal of toxic sites on Oil Company Road, the creation of extensive wetland strips, the bypass across the Oxbow, and expansion of recreational potential northeast of the Imola bridge all open the possibility of new uses. Other examples: a) On the Stanley Ranch, a PS Land Use for the wetland flanking the Napa River is inappropriate since it permits up to 40% buildout in a zone which calls for an Open Space designation (which does not now specifically exist, but should) and, b) The CWFA's DEIR addresses current Land Use designations, which are very different from those proposed in the new Plan; TC has been inexplicably changed to TRI in the strip

24.6

24.6 of land between the CWFA and Expo on the east bank of the river. Where did the new LUs come from? This is confusing, misleading, and dangerous.

Appropriate siting of commercial activity, cluster housing, and open space greenbelts must be planned for and reflected in the 'river corridor' concept. Helter-skelter riverside development is not currently mitigated against by proposed Land Use designations.

24.7 3: Explain in detail and **adopt as policy the new Flood Management Plan's concept of a multi-objective project that combines flood protection with river restoration** and a watershed approach. The General Plan must explain that, because the City is a partner with the Corps of Engineers at a time when the national policy for flood control has been transformed to an environmentally-sensitive one, the City can achieve both goals at a cost far less than if it were to undertake either on its own. The Plan should include (perhaps in an appendix) a map of the proposed Coalition plan. Vague references to "alternatives" to a flood plan do not honestly address the reality, which is that **flood protection is absolutely critical to a revitalized downtown Napa**, and that the General Plan's endorsement of the current, extraordinary community process is essential. The current Draft Plan views flood protection in purely economic terms: prevention of damage and the potential for development in now undevelopable floodplain lands. The DEIR's Project Objectives (p S-2, S3, No. 7) makes an ambiguous statement: "Consider the environmental and financial costs of flood control along the Napa River and encourage appropriate development." Whether or not the Coalition flood plan can be achieved, the City must adopt a more visionary policy of viewing any flood management plan as combining the narrow economic benefits already identified with the far larger benefits -- economic, environmental, cultural, social, recreational -- which accrue from the multi-objective approach: flood protection combined with river restoration, achieved with the highest aesthetic standards. The geomorphologically stable river and rich restoration of riparian habitats and wetlands now being planned, with 100-year flood protection, will be a model for the nation and a boon to the City of Napa in many ways.

24.8 4: **The new General Plan must more fully and clearly embrace the Urban Downtown Riverfront as key to the revitalization of downtown Napa.** The siting of the CWFA on the Oxbow gives the City an incomparable anchor at the north, while plans for the historic Hatt Building south of Third give a dynamic attraction towards the southern end of the urban reach. But those two projects risk being isolated islands in continuing 'blighted' and 'deteriorated' waterfront district unless the General Plan mandates, by policy and implementation (with an urgent, short time frame), the creation of a Specific Plan for the Urban Waterfront District. A sprucing up of Soscol is planned even before the far more important planning for the Center's environs on both sides of the river and for the river corridor in which the CWFA sits.

The need for a **Specific Plan** and for **Development and Design Guidelines** has long been a concern of Friends of the Napa River. We have already submitted a copy of the Guidelines a large group of community professionals recently prepared under our aegis, and we urge that they be



included in the General Plan's appendix as a base point for further refinement of Guidelines which must be adopted by the City Council and incorporated into the General Plan. The General Plan should also state as policy, with implementation, that guidelines for the entire riverfront within the City boundaries will be prepared.

24.8

We also recommend that the Draft Plan state as implementation for a superb and successful urban riverfront that negotiations be entered with the County to assure that river-fronting County lands will be dedicated to the goals of the urban riverfront.

24.9

We also recommend that the **aesthetic component** of environmental impact be more carefully addressed by the DEIR and Draft Plan. The relocating of Soscol should be considered (perhaps to align with Burnell and McKinstry) as the flood plan reduces the available land on the Soscol side of the Third Street river gateway and makes Soscol, with its traffic and commercial uses inappropriate to the urban riverfront, almost the front door to the riverfront.

24.10

The DEIR and Plan should mitigate for transportation and parking challenges in the urban riverfront district by stressing more strongly in policy, goals, and implementation, the development of excellent pedestrian linkages between CWFA, Expo, Wine Train, and downtown; free short-range shuttle buses, and docking for small private and commercial transportation boats.

24.11



## C: SPECIFIC ADDITIONS AND CHANGES

Items not found in the General Plan

- 1) Map of Riparian Corridors
- 2) Map of Creeks
- 3) Map of flood plain
- 4) Map of floodway
- 5) Implementations on Land Use policies 9.1 thru 9.6, Health and Safety-3.1 thru 3.9, Natural Resources-2.1 thru 2.3, 4.1 thru 4.6.
- 6) Open Space designation
- 7) Land Use designations that would establish the desire for a "linearparkway" along the Napa River (Introduction to Draft General Plan page 4).
- 8) Napa River Subject Area Element

Land Use Chapter 1

LU-6A The City shall prepare a plan including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, and natural resource/environmental/cultural focus for downtown.

LU-9.2 The City shall continue to apply special development standards to proposed development with in 1/4 mile of the following areas:

- a. Riparian corridors and wetlands
- b. Hillsides
- c. Critical wildlife habitat; and
- d. Agriculture land outside the RUL.

LU-9.3 The City shall require the maintenance of wildlife corridors and prohibit the fragmentation of large natural plant communities when environmentally sensitive sites are developed, or mitigate such fragmentation with science-based corridor plans between resulting habitat clusters and to other wildlife corridors.

LU-9.4 The City shall discourage development in high priority environmentally-sensitive areas and encourage cluster forms of development near other natural resources.

LU-9.5 When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings:...

24.17

## Natural Resources Chapter 7

Major Natural Resource objectives page 7-1

**ADD Maintain a Living Napa River (see glossary)**

## Glossary

### *Living River*

*A "living" Napa River and its tributaries is a river system with structure, function, and diversity. It has physical, chemical, and biological components that function together to produce complex, diverse communities of people, plants, and animals. The health of the entire watershed, from the smallest headwater trickle on the slopes of Mt. St. Helena to the broad expanse of the estuary, is the summation of natural and human activities in the basin and how they affect certain undeniable physical processes common to all river systems.*

24.18

*A "living" Napa River system functions properly when it conveys variable flows and stores water in the flood plain, balances sediment input with sediment transport, provides good quality fish and wildlife habitat, maintains good water quality and quantity, and lends itself to recreation and aesthetic values. A "living" Napa River conveys equilibrium and harmony with all that it touches and resonates this through the human and natural environment*

## Page 7-2 WETLAND HABITAT

....Wetland preservation and maintenance **shall** be designed as part of new development projects and public works projects (e.g. flood control).

24.19

## Page 7-4 POLLUTION

(add) **The City shall consider wetland construction for the treatment of urban surface runoff.**

24.20

Natural Resources-1.3 The City shall **require** the planting of native plant species in natural habitats.

24.21

Natural Resources-1.4 The City shall review all future waterway improvement projects (e.g., flood control, dredging, private development), as well as all projects that are within 300 feet to account for flood dispersal areas and wetlands of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also require native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce stormwater runoff volumes. Native plantings increase between-storm stream flows through greater recharge in the adjacent floodplain, provide valuable wildlife habitat throughout the year, and enhance aquatic habitats.

24.22 ADD

*a. Provide tree cover along streams to provide shade for the stream, which protects fish habitat; decreases in-stream growth of vegetation (such as willows and tules) that may block flow in wet months; decreases water temperature; decreases evaporative losses of water; decreases algal bloom and subsequent eutrophication in dry months; and increases property value.*

*b. Enhance riparian cover that is contiguous across property lines to increase both wildlife habitat and real estate values.*

*c. Provide streams with access to their flood plains where possible. Where streams are heavily incised, flood plains would be redeveloped beside the new channel at the new, lower elevation.*

24.23 Natural Resources -1.6 The City shall require as a condition of approval that development provide protection for significant on-site natural habitat. **STRIKE** *whenever possible. If such habitat cannot be avoided without loss of any economic use of the land, the City would permit equivalent mitigation off-site.*

24.24 Natural Resources-1.10 The City shall pursue appropriate new management practices for reducing the impact of pollution from urban activities, including the construction of wetlands to trap and biologically treat urban runoff before release into waterways.

24.25 Natural Resources-1.12 The City shall develop and adopt mandatory guidelines to increase the use of permeable or semi-permeable materials for parking lots and the off-street paved areas.



## Page 7-4

## Habitat Corridors:

.....Two ways of establishing habitat corridors are: 1) developing inter and inter-city habitat open space green belts on public lands and habitat open space easements on private land with the participation of the Napa County Land Trust; and 2) obtaining habitat open space easements. **ADD during the subdivision process.**

24.26

## Aquatic Recreation:

.....An enforceable maximum speed limit of five miles per hour and **ADD a no wake zone** north of the County's boat launch at the end of Cuttings Wharf Road **north to navigable limits**.....

## Page 7-5 Implementation Programs

Time frames are FY 02-04 these are too long. Too much damage could be done by then to the riparian habitats.

24.27

## Chapter 7 Natural Resources

Groundwater Page 7-8 **ADD**

*Groundwater recharge is important to maintain between storm levels in creeks and tributaries to the Napa River. Recharge occurs by maintaining the floodplains, limiting impermeable surfaces, and by collecting runoff in detention basins and swales.*

24.28

## Page 7-9

NR-4.3 The City shall support the monitoring and assessment of the effects of dredging in the Napa River. **ADD Assess the effects of dredging on water table for depletion and salinity.**

24.29

**NEW POLICY And/Or "Mitigation"**

NR-3.4 Actively encourage and educate landowners in implementing watershed management practices in the NCRCD Owner's Manual.

24.30

NR-4.7 *Replenish groundwater by discouraging impermeable surfaces, using detention basins and swales to improve quality and quantity of groundwater.(see N.R. 1.12)*

24.31

NR-4.8 *No creek shall be forced underground or be covered..*

24.32

NR-4.9 *Parks, golf courses, cemeteries and playing fields should adopt low pesticide and fertilizer use management techniques to eliminate tainted runoff into drainages.(see N.R.-1.10)*

24.33

NR-4.10 *The City shall support the maintenance of a geomorphically stable river that will not create abnormal sediment deposits (as is being developed in the current flood management plan).*

24.34

## Chapter 4 Community Resources

## Storm Drainage

24.35 **ADD** Policy CS-11.10

*Creeks should not be looked upon as stormwater runoff channels. No creek should be required to carry more runoff than predevelopment.*

**Introduction**

24.36 Page 16

**Strike** ....would virtually eliminate flooding in the central city.

**Add to section on flooding in Chapter 8 page 8-9**

24.37 The 1993 floods in the mid-west has brought about a new policy supported by the Army Corp of Engineers that of Floodplain Management. The Corp along with other experts in the field of hydrology warn that trying to predict the plain of the 100 year flood is not possible due to the lack of information over time and the changes in the variables within the floodplain e.g. development. Flood control projects have given cities a false sense of security, additional building in the floodplains and floodways overrides the purposes of the initial project. No flood control project will ever protect Napa completely. To minimize economical losses from flooding in the floodplain, the city might choose to place more openspace in this area. Lower floors in buildings should be above the floodplain or be floodable. Buildings should not act as floodwalls raising flood levels on adjacent properties or restricting the flow in the floodway.

## Chapter 8 Health and Safety

## Flooding

24.38 All the HS-3 policies should be re-evaluated to correct inconsistencies. For instance, some policies concern themselves with the protection of residents and property owners from the hazards of development in the floodplain and other policies seem to encourage development in the floodways and floodplains.

24.39 HS-3.2 The City shall continue to apply flood plain management regulations for development in the floodplain and floodway, **and require that new development show how it will affect downstream flows and flood potential.**

24.40 HS-3.6 The City shall support **STRIKE** (alternative) programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that attempts to prevent damage to natural resources while providing the most cost-effective solutions.**

**Add Policies and/or Mitigation measures**

*Policy H.S. 3.10 Flood control channels should be kept in functional condition. Where possible, tree cover on channel banks should be used to control in channel growth of vegetation.*

24.41

*Policy H.S. 3.11 The City shall assist homeowners and businesses in the floodplain with floodproofing their property. Assistance could be in the form of applying for grants to facilitate the floodproofing, low-interest loans, property tax breaks, labor, organizing volunteer work parties etc;*

24.42

*Policy H.S 3.12 The City shall assist property owners to locate out of the floodway and the floodplain.*

24.43

*Policy H.S 3.13 No property owner in the floodplain of the Napa River or a tributary will be allowed to add fill to their property.*

24.44

Respectfully submitted,  
December 2, 1996



Moira Johnston-Block  
President  
Friends of the Napa River





# Friends of the Napa River

For Release April 12, 1996:

The Landmarks Building  
1026 First Street • Napa, CA 94559  
Phone (707) 255-8646 • Fax (707) 255-2164

DEC 1996  
RECEIVED

## INTERIM GUIDELINES FOR THE CITY OF NAPA'S URBAN RIVERFRONT

These interim guidelines are a work-in-progress prepared in response to urgent community need. They are a set of guiding principles, voluntary and advisory for now, for everyone, public and private, involved in the development and restoration of Napa's urban riverfront. They are an attempt to forge a cohesive articulation of the vision, growing for several decades, of restoring Napa's scarred river to vibrant health and returning Napa's downtown waterfront to the hub of dynamic activity it was -- the heart of a revitalized river district which will bring huge economic, cultural, and recreational benefits to the entire Napa Valley as well as to visitors. As planning for the first exciting projects (Center for Wine Food and the Arts, Hatt Marketplace, Noyes Lumber site) moves ahead, as a sensitive and beautiful flood control project emerges, as downtown improvement initiatives proliferate, we need a common language for the urban riverfront *now*. *Successful river cities have guidelines.*

The design and development professionals and urban river stakeholders who contributed to these guidelines drew on a rich legacy of ideas: the Roma and Sasaki plans, the City's River Trail, Renaissance Napa, and myriad community efforts. It drew on the experience of many other river cities, from San Antonio to Portland, which have already learned the potent power of a river as a revitalizing force. We have the potential to be the national model for urban rivers, but we must do it right. These guidelines are a starting point, to be further developed to a professional level, then adopted by the City Council, and integrated into an urgently-needed specific plan for the downtown river district and into the new General Plan. These principles will, we hope, be embraced by the community, by landowners/developers along the river, and in public policy, zoning, and development standards. Emerging in tandem with the community's alternate flood management plan, they will, we hope, encourage wonderful, quality projects along the river.

We urge the City to encourage and expedite projects sensitive to these guidelines, and to discourage projects that are not. The guidelines apply with or without flood control. Like the living river, this is a living document; comments are welcomed.

\* \* \* \* \*

Contributors: Moira Johnston Block - Guidelines Chair, Juliana Inman, Karen Rippey, Dorothy Lind, John Whitridge, Vince DeDomenico, Mike McKaig, Barbara Stafford, Harry Price, Bill Bylund, Chuck Shinnamon, Liesel Eisele, Farnum Kerr, Dick Williams, Philip Vandetoolen, John Clifton, Tony Norris.

## GUIDELINES FOR CITY OF NAPA'S URBAN RIVERFRONT:

The goal of these guidelines is to guide the community to achieve a unique urban riverfront which: 1) will be a festive, vibrant, and compellingly attractive locus for public gathering which reflects the spirit and nature of Napa Valley, 2) maintains and restores the Napa River as a healthy, living river, and captures the magic and beauty of the river, and 3) brings, as a by-product of those two goals, broad-ranging and enduring social and economic benefits to our entire Napa Valley community.

### General Character:

24.45 : The urban riverfront is defined, here, as from the north end of the Oxbow to south of the Hatt Building, with the lower reach of Napa Creek and a proposed bypass included.

: The health and biological diversity of "the living river" must be consistently maintained as the river co-exists with the human community along its banks.

: The urban riverfront should be a lively, festive, and attractive public gathering place for cultural, commercial, and recreational uses that reflects the friendly, historic, 'village' quality and scale of our city and riverfront. All architectural, landscaping, and design elements should enhance and support that.

: All projects should be oriented towards the river, acknowledging and enhancing both the river and Napa Creek. The river is not the back door. The river 'door' should receive equal or greater design attention than the street 'door.' Service and utility uses should be avoided on the riverfront.



: Linkages are vital, creating connections between the riverfront , the waterway, and the surrounding community. Linkages are important, too, in achieving the vision of a multi-mode transportation system of linked river ferries, an extended train system, shuttle buses to upvalley, and a network of pedestrian pathways which would benefit the entire Napa Valley by reducing automobile use in this fragile agricultural valley.

: Buildings: Architecture and building materials should be reflective of and sympathetic to the several historical architectural styles and structural forms of the Napa Valley. The imposition of a single building theme or style along the entire length of the waterfront is not recommended; rather, the design of new development should be scaled and detailed in a way that complements the historic character and role of Napa's riverfront, without resorting to contrived or overly thematic approaches that could soon become outdated. This does not exclude fine contemporary architecture, if 'spirit', landscaping, and materials are compatible with neighboring riverfront and habitat integrity.

24.45

: The River Corridor and the continuous River Trail are the unifying features of the urban riverfront, a unity which should be achieved by the cohesive 'look' and flavor, the aesthetic spirit, of the riverbank, trails, decks and promenades and by a consistency of materials and design (in common elements such as surface, lighting, trail "furniture", guard rails, trees and plantings). The Trail through the urban riverfront would connect people to the more pastoral river trail to the north and south which would offer a variety of recreational experiences -- wetlands, sports fields, fishing sites, equestrian paths, for example.

: This is a pedestrian area, requiring a critical mass of people to be successful. Development designed to the criteria and in the spirit of the 'urban riverfront' should be concentrated within its defined boundaries and not be permitted to sprawl and leapfrog beyond them, as it would do three negative things: create a 'commercial strip' not unlike the faceless, town-destroying automobile strips of America; dilute the needed concentration of pedestrian traffic; and 'eat' into the green belt open space which must also be developed and preserved along the river. These goals must be achieved and controlled through zoning and the General Plan.

: Open space. A percentage of each project should be devoted to open space -- spaces which invite a meandering flow and clustering of pedestrian traffic, with visual surprises, seating areas, river vistas, focal 'gathering spots' (fountains, sculptures, etc.), shade trees, cafe decks, flower baskets, banners, color in flowers and plantings, etc.

### **Specific Guidelines for Use and Design:**

(These can only be preliminary approximations until the flood control design is complete, and until a more rigorous, detailed and professional set of development criteria can be prepared with guidance of City staff)

: All structures and improvements should be designed, sited, constructed and maintained to anticipate that flooding *can* occur with or without the 100-year flood protection which is the goal (the 101-year event happens!). Inexpensive flood-proofing and floodable ground floors, plazas, and landscaping should be incorporated.

24.45 : Access: The community must have access, both physical and visual, to the river and River Trail through buildings, corridors, arcades, and walkways from street. Access pathways should be treated as elements of the riverfront, with landscaping and attractive and inviting architectural treatment. There must be pedestrian linkages to the surrounding neighborhood -- to downtown, the Center, the Wine Train, Expo, etc., perhaps including a pedestrian bridge over the river at some point. Bicycles and boats could be part of the 'people moving' system; in Seattle, city-owned bikes are available on the street, free, for anyone to use. Fences should not block access and should be subject to the same general design criteria as buildings.

: Safety and maintenance should be, primarily, the responsibility of owners and tenants, and provisions for both must be built into design of buildings and landscaping to assure an ongoing quality experience. Public access and easements may also require City involvement in control, maintenance, and enforcement policies. For example, the River Trail, which will probably be defined by a public easement, may well be a City responsibility. Since private

owners are encouraged to give public access to the river and River Trail, a public/private partnership for safety and maintenance makes sense.

: Signage, lighting, and sound: Should be sensitive to and reflect the nature of our charming, historic, small town riverfront. Commercial name-brand neon signs should be controlled. Amplified sound should be controlled by decibel standards.

: Setbacks: A complex and controversial issue which cannot be rigidly fixed at this time, but which must, 1) be integrated into the emerging flood management design and, 2) reflect the best current materials, design technology, and biological standards for a built environment which will protect the living river and respect natural river dynamics (point bars, bankfull state, erosion, etc). In some areas, sloped and widened banks, and substantial setbacks may be the solution; in those few, short reaches where the banks have already been severely modified and impaired and where 'hardscape' may be required, it may be river-friendly floodwalls, cantilevering and even piles. Setbacks should accomodate River Trail, decks and promenades. A range of setbacks is possible, given current techniques for bank treatments that protect habitat, contain erosion, preserve water quality, and respect the river's hydrology. The setback for each project will have to be carefully evaluated for river health and compatibility with neighboring projects. Setbacks that create varied experiences along the river (plazas, courts, stepped levels, stairs to river) are encouraged.

24.45

: Quality, sensitivity, and compatibility are the bywords for buildings.

: Historic restorations should be done with integrity and authenticity. Refer to: Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings.

: In single-use projects such as hotels or larger restaurants, monolithic walls and facades are to be avoided. Encourage pedestrian access with visual interest, flow and ambience into and through structures.



24.45 : Materials reflecting Napa's traditions should be encouraged -- *real* stone, brick, wood, etc. Discourage large expanses of glass, especially reflective glass, and overuse of concrete, for example.

: Development Massing: New development should preserve the rhythm and scale of the historic existing buildings and of nearby Main Street. Density should be varied, with clustered commercial next to open river vistas.

: Uses: Diverse multi-use is envisioned for the urban riverfront. The current Tourist/Commercial land use designation is scheduled to be changed to Mixed Use in the City's new General Plan. Appropriate uses are those compatible with a variety of tourist/commercial/retail/cultural/ residential/social/ recreational purposes of both visitors and residents, tourists and Napers, of all ages.

: Residential living space 'above the store' should be encouraged as part of the dynamic mix of uses perceived for developments. Young working couples, retired, and seasonal residents would bring year-round, round-the-clock vitality to the riverfront district.

: Cultural uses should be encouraged. The presence of the American Center for Wine, Food and the Arts, Jarvis Conservatory, Opera House, Main Street galleries, and annual River Festival with the Napa Symphony create a cultural nexus which could be expanded, for example, with a riverside amphitheatre (Veterans Park is one suggested site), public sculpture, street performers, artists studios, art galleries, open-air concerts, more well-done historic wall murals. The City might establish a "cultural arts district" overlaying the riverfront district, as Eureka has done.

: Retail shops should be of an intimate, quality nature appropriate to a world center of wine, food and good living and yet offer some 'real life' services that will make it attractive to Napa's families as well as to tourists. An indoor, year-round farmer's market would be an excellent element (Vancouver, B.C.'s Granville Island and Seattle's Pike Marketplace are successful examples). Restaurants and cafes of high quality and diversity are encouraged.

: Examples of inappropriate uses: Fast food chains, convenience stores (7-11s), single-use office or institutional buildings, industrial uses, low-end factory outlets.

: Banks and Landscaping. Although the short urban reach of the river will, with flood control, be somewhat modified from its natural state and configuration, all efforts should be made in landscaping to restore and enhance the natural living quality of the river's edge through native plants endemic to the Napa River, and wildlife and fish habitats. This will give continuity to the river corridor and ensure a healthy riparian environment; optimally, a continuous necklace of reeds and other emergent plants at the water's edge protects fish from predators. This is an urban river, however, and landscaping of buildings and plazas need not fully recreate a natural riverbank. In those short reaches where a hard edge cannot be avoided, innovative, more natural solutions should be utilized for bank stabilization. Displays of color are appropriate, particularly at key entry points to the river corridor and at linkage points to other greenways. Exotic plant material that is documented as being invasive, allelopathic or otherwise overly competitive shall be excluded from the landscape. Sites shall be protected from erosion during construction, and existing trees protected, where appropriate. Topsoil native to the site shall be used in landscaped areas, if possible. Proper drainage must be designed.

: Parking: Parking lots should not front on the river. If possible, no surface or stacked parking should be on the river-side of Soscol or Main Street. Well-designed parking structures which blend into the river district may have to be built a block or two back from the riverfront. Where parking can be accommodated on site, it should be basement or depressed parking, where feasible. The City should be encouraged to work with developers to find off-site parking locations, and Redevelopment might assist the first developers with financing.

: Use the river as a waterway, building small docks (floating, or best technology available) for small shuttle boats and private boats, where possible, to make the river a dynamic link in the transportation system as it was historically. The concept of 'coming to lunch by water' should be integral to the concept of the riverfront. San Antonio's very popular use of small pontoon boats to shuttle people to several designated stops along the River Walk could be adapted to

24.45

the Napa River. There is much enthusiasm for a ferry service from San Francisco and/or other points on the Bay. Because of the hours it takes to motor by boat to downtown Napa, facilities should invite it being a boater's destination for an overnight stay. At least one small 'safe harbor', perhaps at the site of the historic wharf south of the Hatt Building, is encouraged. No-wake speeds and engine noise on the river will be strictly controlled north of Kennedy Park.

: Maximum height for riverfront structures: 3 floors or 45 feet. No more than two floors on river-facing facade. Step backs required for buildings taller than two stories. Consideration will be given to special architectural elements which may exceed 45 feet, on a case-by-case design quality basis. These standards should be reevaluated when the final flood control design is complete.

: Water runoff: Runoff from new development should be impounded and released at a rate of discharge equal to the rate of discharge from the undisturbed site. Use the most practical, technologically-best solution for controlling runoff flows.

: New bridges should be beautifully designed, reflect the valley's famous traditional bridges, and have open views of the river through railings. Because of the visual prominence of bridges in the riverfront project, bridge design competitions are encouraged.

: Projects must accomodate maintenance activities appropriate for an urban/riparian interface environment.

: Absent any formal evaluation mechanism at this time, project evaluation could be done by an ad hoc Urban Riverfront Project Evaluation committee of competent professionals, in addition to City staff and the Planning Commission.

**Welcome Back to the River!**



# Friends of the Napa River

GENERAL PLAN COMMUNICATION #25

The Landmarks Building  
1026 First Street • Napa, CA 94559

Phone (707) 255-8646 • Fax (707) 255-2164

DEC

**FROM: FRIENDS OF THE NAPA RIVER**  
**TO: THE CITY OF NAPA, CALIFORNIA**  
**RE: ADDITIONAL WRITTEN COMMENTS ON THE**  
**DRAFT ENVIRONMENTAL IMPACT REPORT AND**  
**DRAFT GENERAL PLAN POLICY DOCUMENT**

December 2, 1996

1: NOTE: We did not receive the missing statement on Page 2-10 of the DEIR in time to incorporate our comment into Friends' Written Comments, delivered to you today. However, I would like this brief comment below to be attached to Friends' comments.

: Under Economic Development section, DEIR Page 2-10, the last sentence should be changed to read: In its efforts to foster this economic development and to reduce the amount of commuting to and from the city, the Draft General Plan calls for attraction of higher paying technical and professional jobs, encouragement to business sectors that contribute significantly to the City's fiscal health (such as Auto Row), strengthening the physical connection between **Downtown, Old Town, the Center for Wine Food and the Arts, and the entire Urban Riverfront district from North end of Oxbow to South of Hatt Marketplace, and promotion of the downtown -- with the Urban Riverfront as its centerpiece --** as a 24-hour destination serving as a key element in the City's tourist economy, as well as the City's regional/local/retail/administrative center.

2: The City's Flood Control Plan, or Flood Management Plan as it is called by the Community Coalition, has already been addressed in our Written Comments, but we wish to add that the impacts of Flood Control on growth and development must be much more specifically and carefully addressed in the Draft General Plan as directed by the DEIR's 4.3 (Chap 4, p 4-1), Growth-Inducing Impacts, because Flood Control has a direct growth-inducing impact. Our concern, as stated earlier, is that flood control is viewed primarily by the City as an opportunity for development in the floodplain -- a very complex, challenging and questionable goal demanding thoughtful treatment in the Draft Plan.

Thank you,

Moir Johnston Block,  
President



8 26.

moira johnston block



GENERAL PLAN COMMUNICATION # 26

December 2, 1996

Planning Department  
City of Napa

**Re: Written Comments on DEIR for City of Napa Draft General Plan**

Dear Mr. Yost and Ms Faaborg:

I wish to submit a personal written comment:

: Re: DEIR #3, page 3.6-4: The DEIR states a General Plan policy of protecting hillsides on environmental grounds, as both an open space resource and as an aesthetic visual resource (DEIR p 2-10, p 4-5) -- in addition to erosion and watershed management issues. **I strongly oppose the plan to permit development in the 13 acres west of Foster Road.** The rationale that development on those highly-visible hillside acres will not have any negative viewshed implications is a spurious one, indeed. It argues that because one serious mistake has been made, that mistake justifies another. The views of the beautiful hills on the southwest side of Napa, an important part of the visual gateway to the valley, have already been disastrously compromised by the development permitted in the past, right up to and including the ridgelines. An additional 13 acres of housing on steep hillsides, clearly visible from Highway 29, the main entry artery to Napa Valley, will only exacerbate the terrible visual damage already done. **The negative impact is not mitigated.**

26.1

Thank you,

Best regards,

  
Moira Johnston Block







Sierra Club Napa County Group  
PO Box 644  
Napa, CA 94559

## SIERRA CLUB

GENERAL PLAN COMMUNICATION # 27

December 2, 1996

John Yost, Planning Director  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559

Dear Mr. Yost:

Attached please find the Sierra Club Napa County Group Written Comments on the City of Napa Draft Environmental Impact Report and Draft General Plan Policy Document *Envision Napa 2020*. This document supersedes our comments dated November 18, 1996, rendering them null and void.

These comments represent our values and goals, and provide options for responsible and successful development of the City of Napa. We have achieved this through a critical analysis of the General Plan, the mitigation measures therein, and potential impacts as described in the Draft EIR and as illustrated by us. We believe that the changes we offer to you provide a good foundation for smart development that protects and utilizes our natural environment to make Napa an even better place to live.

We appreciate the opportunity to provide our written comments and look forward to continue working with you in our effort to ensure that the Draft EIR and General Plan protect our rich natural resource heritage while enhancing our quality of life.

Sincerely,

Anthony Norris, Chair  
Sierra Club Napa County Group



# **SIERRA CLUB NAPA COUNTY GROUP**

**WRITTEN COMMENTS ON THE CITY OF NAPA  
DRAFT ENVIRONMENTAL IMPACT REPORT AND  
DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020***



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**SIERRA CLUB NAPA COUNTY GROUP  
WRITTEN COMMENTS ON THE CITY OF NAPA  
DRAFT ENVIRONMENTAL IMPACT REPORT AND  
DRAFT GENERAL PLAN POLICY DOCUMENT *ENVISION 2020***

**I. INTRODUCTION**

The City of Napa now has a decades old heritage of protecting its open space, with gusto. This effort has provided all of us with world famous agriculture, charming vistas, protected enclaves of native animal and plant species, recreational activities, the beauty and bounty of the Napa River, and a strengthening community will to improve on our heritage. The Draft General Plan (DGP) and Draft Environmental Impact Report (DEIR) should speak to our desire to protect and enhance our natural environment while improving our quality of life. While some aspects of these documents are commendable, they generally fail to provide real guidance toward a healthy community for the next 25 years.

The DEIR is fundamentally flawed in that it attempts to address a project that is unstable and poorly defined. It leaves those preparing the DEIR to struggle and address potential impacts of plans that have not yet been solidified. A DEIR cannot represent a good faith effort to analyze potential project impacts when the project (DGP) is vague and inconsistent to the point that it is rendered virtually meaningless as a guiding document.

The DEIR text on one hand claims to maintain the RUL over the next 25 years but then proposes over 440 acres of new annexations be added immediately. Amazingly, the document then establishes a mechanism for allowing unlimited annexations over the next two decades without the requirement of even a general plan change. Other contractions include a proposal to ensure paced growth, though no system is established to do so, a proposal to establish "permanent greenbelts", though no implementation program is proposed to accomplish this, and a proposal to protect wetland habitat but allow developers to fill wetlands providing they agree to attempt re-establishment elsewhere.

Some mitigations in the Draft General Plan are actually plans to determine impacts or adopt policies at a later date. For example, Policy NR-4.4 states "The City shall adopt standards and regulations for the reduction and/or elimination of the nonpoint sources of pollution." However, Public Resource Code §21002 and §21081 and California Environmental Quality Act Guidelines §15002 and §15091 state that mitigation measures cannot be developed at a later date. This was supported in the court case *Sundstrom v. County of Mendocino*. This Draft Environmental Impact Report's attempt to identify and analyze impacts of mitigation measures yet to be developed make it, from the outset, inadequate.

The Draft General Plan, which contains all of the mitigation measures for the Draft Environmental Impact Report, has not been adopted. The mitigations, at this point, have no validity.

Any substantial changes to the current Draft General Plan will require that the Draft Environmental Impact Report be revised and once again be made available for public review and comment.

Also, we find the DEIR confusing with so many cross references. In the California Environmental Quality Act Guidelines §150 it states that this document must be understood by the reader without the need of undue cross reference. The California Act was modeled after the National Environmental Policy Act, and it states that in *Baltimore Gas and Electric Co. v. Natural Resources Defense Council*, an EIR should be essentially a self-contained instrument. This DEIR references numerous documents, including the Draft General Plan, the Background Document, the Fiscal Analysis, BAAQMD CEQA Guidelines, the Water System Optimization and Master Plan, the Airport Land Use Compatibility Plan and Policy Resolution No. 27.



## II. THE DRAFT EIR COMMUNITY INPUT PROCESS IS FLAWED

27.1

The General Plan review process chosen by the City initiates an environmental review of an incomplete Draft General Plan (DGP). Major issues, as identified by the Draft Environmental Impact Report (DEIR), still remain. They include developing the floodplain, the extension of the Rural Urban Limit (RUL), a higher density housing infill strategy, and growth management measures. (p. S-4.5). The City of Napa (City) must arrive at a stable and definite project (DGP) before a valid environmental review may be conducted. The DGP process could have included an effort to address and/or resolve these issues before conducting the environmental review. Without this, the DEIR cannot identify and mitigate for potential project impacts. For example, the DEIR does not address the impacts of floodplain development without a flood project, although the intent of the DGP is to allow development in this area, with or without a flood control project (HS-3.9, LU 9.6, p. 1-21 objective #4).

## III. IMPACT IDENTIFICATION AND ANALYSIS IS INADEQUATE, AND MITIGATION MEASURES ARE OFTEN VAGUE

The DEIR makes some attempt to identify impacts, but makes no attempt to analyze them. Usually the reader is expected to except the City's assertion that all mitigations in the DGP prevent any significant adverse impact of implementing the preferred alternative of the DGP without supporting data. At times there are contradictions between the DEIR and the DGP.

The following are the Sierra Club's detailed comments on major portions of the DEIR that should be addressed during the environmental review process.

### A. LAND USE

#### **Land use policies are not specific enough to serve as mitigations.**

Many of the policies that the DEIR considers adequate to fully mitigate project impacts are not specific enough to do so. For instance, DGP policy LU-3.2, which suggests an agricultural setback be provided "between residential uses on the periphery of the RUL and productive agricultural land outside the RUL," provides no description of this setback. (p. 1-11). Further, no implementation program is listed to ensure the measure is ever undertaken.

27.2

Policy LU-9.2 will apply "special development standards to proposed development within or adjacent to" sensitive areas. (p. 1-21). What are these special standards? Not only does the reader of the DGP and DEIR already have to read a plethora of outside documents, but this policy incorporates mystery standards at mitigation for the DGP. The DGP must plainly state to what standards Policy LU-9.2 refers.

**Standards of significance are inadequate and findings of insignificance are not supported.**

The basis for findings of significance with regard to the Stanly Ranch are flawed or nonexistent. The DEIR fails to adequately analyze the substantial alterations in type and intensity of land use proposed for the Stanly Ranch. The DGP indicates that there is a proposal to develop Stanly Ranch as a destination resort "comprising of 300 lodging units, with conference, meeting room, and related facilities. An 18 hole golf course and clubhouse with recreational amenities are also planned." (p. 1-7). Also included in the plan are 550 homes and a commercial wine center. It provides for a Floor-Area-Ratio (FAR) of 0.50, but potentially up to 1.0. This proposal is clearly not in keeping with the character and identity of the surrounding area. It is wholly inappropriate for development on the fringe of the RUL. Such development would remove high quality vineyard land from use, generate substantial traffic, increase water runoff due to construction of impervious surfaces, and assault the visual aesthetics of the area.

The DEIR defines conversion of "economically viable important farmlands to nonagricultural uses as a significant effect" and clarifies that loss of "small agricultural plots not on prime agricultural soils when contiguous with urban development is considered adverse but not significant." (p. 3.2-3). But then the document finds the loss of agricultural land at the Stanly Ranch, a noncontiguous parcel used for both premium grape growing and cattle grazing, insignificant.

The relative change in intensity of land use at the Stanly Ranch and its impact on the character of the neighboring area are virtually ignored in the DEIR. The text of the DEIR further explains that uses causing significant impacts are described as those that would "substantially alter the type or intensity of land use on a proposed site, causing it to be incompatible with surrounding land uses or the overall character of the surrounding neighborhoods." (p. 3.2-3). The DGP would allow an island of significant urban development in the largest open space area within the RUL. It is a violation of Goal LU-2, Policy LU-2.2, to "support Napa County's agricultural and other resources uses," and to ensure that "... land outside the RUL is conserved primarily for agriculture ... ." (p. 1-10,11). The Stanley Ranch development will put additional market pressure and upward land values on adjacent vineyard lands, creating a dangerous situation conducive to further RUL expansion and vineyard conversion to housing tracts. This in turn would further violate Goal LU-1, and would be in general contradiction of the stated objectives of the DGP. Furthermore, this island of urban development is leap-frog development within the RUL. It would deliver added financial incentive to pave over land between the Westwood and Central Napa Planning Areas and the Stanley Ranch. This area is vital for its grazing, wetland, flood control, aesthetic, and visual gateway characteristics, Although Table 2-3 (p. 2-14) of

27.3



the DEIR indicates residential development would increase by 60,000% at the Stanly Ranch, the relative impacts of this land use change is simply brushed aside as insignificant.

27.3

Stanly Ranch is located in the Carneros Region, a world renown grape growing appellation. Its vineyard land ought to be recognized as some of the most valuable in existence. The DEIR disregards the loss of this agricultural land by suggesting it be viewed in the context of "the greater Napa Valley" and suggests that Class I and II soils are the only lands suitable for local agriculture. But small vineyards of unusually high value are located on other classes of soils throughout the region. Many Napa Valley vineyards, though small in the context of the greater Valley, are of critical value to businesses functioning in the local premium wine industry. Their significance cannot be measured simply by acreage or general soil class. The assigned land use designations for Stanly Ranch-- Single Family Residential, Tourist Commercial, and Single Family Infill -- are in direct opposition to Goal LU-1. Specifically, they do not recognize the importance of this historic grape growing district as required by Policy LU-1.4.

27.4

In another example of unsupported conclusion, the DEIR makes a finding of consistency with the Airport Land Use Compatibility Plan (ALUCP) without any justification. The DEIR then suggests that review of the DGP by the Airport Land Use Commission (ALUC) would mitigate project impacts. Even though the Airport Land Use Commission (ALUC) has yet to comment on the City DGP, the DEIR asserts that land uses will be "restricted" and "safety standards imposed" in accordance with the ALUCP. In reality, ALUC review cannot assure any mitigation occurs. The DGP specifically states that the ALUCP plan may be overridden by the City through a simple procedure.

27.5

The DGP land use designations of the Stanly Ranch would specifically allow conversion of this viable agricultural land to urban use. The finding of insignificance therefore has no basis. Although many explanations are provided to try to justify this finding, including that the proposed land use pattern "is an expression of the collective vision of the community," we find this conclusion confusing since the Citizens Advisory Committee on the General Plan Update was unable to reach agreement on many land use issues such as Stanly Ranch development. The Planning Commission and City Council have likewise not yet resolved these land use issues.

#### **Impact analysis is not sufficient.**

27.6

The DEIR in Land Use Section 3.2 states that within the Rural Urban Limit (RUL) "Usable acreage does not include environmentally sensitive areas or waterbodies since those areas are generally not considered suitable for development." (p. 3.2-3). This is in contradiction to the DGP, where in Chapter 1, page 1-1, it states that "This General Plan emphasizes Napa's commitment to containing urban development within the RUL. As a result, much of the new



development will occur within existing neighborhoods and in areas with sensitive constraints, (e.g. hillsides, floodplain)." The DEIR seems to preclude development in environmentally sensitive areas while the DGP allows this practice. Moreover, the DGP, on page 1-21, also allows "the reclamation of lands near the river for sensitive urban use."

27.6

However, the DEIR does not adequately address land use impacts within the RUL, or added RUL expansions. The Big Ranch area includes significant open space, native vegetation, flood control, and watercourse characteristics, yet impacts of the DGP on these beneficial uses and resources are not considered. The Stanly Ranch and proposed RUL expansion area west of Foster Road are even more sensitive. Each of these areas are the subject of preliminary land use proposals. The DEIR must fully address these current land use proposals and their potential impacts.

27.7

If the Big Ranch, Stanly Ranch, and Foster Road areas are to be developed, we request a specific plan be proposed and implemented for each of them.

To further the idea that development of agricultural lands within the RUL is not a significant impact, the DEIR states that this would be "... future development consistent with the land use policies of the General Plan and zoning." (p. 3.2-6). In *Environmental Planning and Information Council v. County of Eldorado (1982)* the court provided that environmental impacts cannot be compared to that of an existing plan, as the DEIR does here, but must determine actual impacts on the existing environment. Thus, the DEIR cannot not make a determination that development of agricultural lands within the RUL is insignificant just because the General Plan and current zoning allow it. The DEIR must investigate and analyze explicit environmental impacts. The DEIR will not be in compliance until that happens.

27.8

### **Impacts and growth inducing effects of the proposed RUL expansions are not adequately addressed.**

RUL expansion would envelope 440 acres of property. The DEIR dismisses the impacts of the RUL expansion encompassing the Napa State Hospital, asserting that the grounds are already "urbanized". In fact, undeveloped portions of hospital land serve as a buffer between developed portions of the property and the adjoining Skyline Park and open area to the south. Though purchase of a 100 acre portion of the hospital property is the subject of negotiations between the State and private development interests, the DEIR does not consider the impact of more intensive use of the property that would be accommodated by its inclusion within the RUL. In fact, the City offers no justification for embracing these areas within the RUL other than a vague effort to "improve the area's defensibility". (p. 3.2-5).

27.9

27.10 | Significant adverse impacts of including the 13 acre Foster Road area parcel are also not adequately addressed. The high elevation area is lacking in sewage, water, and safety services and is in a seismic hazard area. The City cites no legitimate benefit of including this area within the RUL.

27.11 | The DGP Policy A-2.1 sets out criteria for expanding the RUL. (p. 9-2). But no effort is made to describe how these standards apply to the proposed RUL expansion areas. Additionally, the DEIR fails to consider and analyze impacts of more RUL expansions that would be allowed under this policy before the year 2020. Inclusion of this policy in the General Plan would allow an unlimited number of RUL expansions by the City Council on any Tuesday evening without the need for a general plan amendment. Furthermore, numerous parcels contiguous with the current RUL are already eligible for inclusion within the RUL, based on these criteria. The impact of these potential RUL expansions and the impacts of related growth and infrastructure and public service demands must be addressed by this EIR.

**The growth rate projection and resulting impact analysis in the DEIR are not valid.**

27.12 | The DEIR asserts that the DGP incorporates a "confined city policy" to maintain the current RUL and establishes a "development pacing" strategy so that land within the RUL will be available for development throughout the 25 year planning period. Yet DGP policies contradict these goals. Policy A-2.1, described above, provides additional RUL expansion with no time restrictions. RUL expansions beyond those reviewed in the DEIR could begin immediately. Further, the DGP maintains that monitoring annual growth will let the City know when growth limits are needed, ostensibly so that steps can be taken to control it. However, no methods of limiting growth are identified by the DGP. Indeed, the document does not explain at what point growth might be deemed too rapid. Absent any expressed growth limit, the City cannot promise availability of land within the RUL over time. The DEIR is void of any consideration of the potential impacts of more rapid growth that may occur should favorable economic conditions develop. The growth rates analyzed in the DEIR therefore have no validity. We note that the 1996 ABAG projections show a growth rate that has already accelerated beyond the City's projections.

**We request the following policy changes and additions.**

27.13 | ♦ Delete Policy A-2.1.

27.14 | ♦ Abandon the proposed RUL extensions encompassing the State Hospital and area west of Foster Road.



◆ New Policy \_\_\_\_\_

The City shall establish a new land use designation "Resource Area", or RA, for the dual purpose of protecting people and property from hazards and protecting important environmental resources from damage or degradation. Resource Area (RA) lands are areas where very low intensity development is appropriate. Conversion of RA lands for residential, commercial, industrial, or public facilities uses is generally not to be allowed. Resource Areas are lands with serious constraints to development characterized by sensitive wildlife habitat, vulnerability to floods, seismic, geologic, or other hazards. Jurisdictional wetlands, hillsides over 15% slope, wildlife corridors, cemeteries, rail lines, and lands noncontiguous with the rest of the City are zones appropriately designated RA. RA lands may be used for passive recreation, agriculture, and permanent greenbelt buffers at the edge of the City.

27.15

◆ New Implementation \_\_\_\_\_

The RA designation shall be applied to the entire Stanly Ranch, Giovannoni peninsula, existing wetlands, and wetland mitigation sites on the Gasser Estate (Imola Avenue), steep hillsides of the Browns Valley, Rollingwood, and Alta Heights areas, Kennedy Park wetlands, and significant habitat and wildlife corridor areas along the river and its tributaries.

27.16

◆ New Policy \_\_\_\_\_

The City shall, in cooperation with the Napa County Land Trust, establish a permanent greenbelt concept consistent with that presented in the Draft 1996 Napa County Airport Industrial Area Specific Plan with linkages to the City trails and wildlife corridors.

27.17

◆ New Implementation \_\_\_\_\_

The City will identify and implement an open space/greenbelt buffer zoning. Greenbelt areas will be established at the edge of the City through conservation easements and/or land use regulations. The greenbelt will be regarded as a permanent area unavailable for development and will be designed to separate agricultural areas of the County from the urban zones of the City.

27.18

(policy changes and additions are printed in **bold** and underlined)

◆ Implementation LU-6.A

The City shall prepare a plan, including land use goals, a business incentive program, and design guidelines to promote high quality private and public development and redevelopment in the downtown. The plan should address design alternatives that would better incorporate the Napa River as a commercial, recreational, **and natural resource and environmental** focus for downtown.

27.19



27.19

Responsibility:      Redevelopment & Economic Development  
Planning Department  
Community Resources  
City Council  
Parks and Recreation

27.20

◆ Policy LU-9.2

The City shall continue to apply special development standards to proposed development within ¼ mile of the following areas:

- a. Riparian corridors and wetlands
- b. Hillsides
- c. Critical wildlife habitat; and
- d. Agriculture land outside the RUL.

Use of the ¼ mile buffer permits identification and mitigation of the most direct adverse impacts on these resources and makes the policy measurable and more enforceable.

**B. TRANSPORTATION**

**Assumptions are not substantiated.**

27.21

The DEIR traffic analysis assumes that a number of road improvements not proposed in the DGP will occur to mitigate for project impacts. No explanation is offered to justify the assumption that these improvements will be in place to further mitigate traffic impacts. The added improvements are neither required nor planned in the DGP.

**The standards of significance are insufficient.**

Here the significance of impacts is only defined in terms of "level of service" (LOS). The DEIR makes no attempt to quantify impacts in terms of actual traffic volume. The only standard of adverse significant impact considered is the level of service (LOS). The DEIR thereby ignores its obligation to address actual relative change in traffic volumes and the accompanying impacts.

27.22

The DEIR then recognizes the likely deterioration of LOS in several areas of the City, but attempts to explain away the impact by stating that it would simply be too expensive to mitigate. However, no attempt is made to identify mitigations and no analysis of potential costs of them is provided. The City cannot meet CEQA requirements for mitigations by simply lowering standards. This doesn't change the seriousness of impacts.

**The impact analysis for transportation related impacts is flawed and incomplete.**

Impacts of roadway expansions/extensions are not disclosed. The DGP calls for roadway extensions and widenings over several creeks, identified in table 3-1 of the DGP as Solano Avenue, Soscol Avenue, Gasser Drive, and Terrace Drive. Roadway creek crossings have been found to be significant contributors to flooding in the City of Napa. Nonetheless, an analysis of potential flooding impacts, and potential impacts to bird, fish, and wildlife habitat is not provided. Similarly, impacts of major roadway widenings at Soscol Avenue and realignment of California Boulevard are not discussed.

The DEIR assumes the City can simply build itself out of traffic problems that will be caused by land use policies proposed in the DGP. But the DGP and DEIR are flawed in failing to address the likelihood of funding availability for roadway improvements (deemed mitigations in the DEIR). The DGP proposes a number of assessment districts and prays that other funds will be available through state and federal agencies while providing no indication of whether these funding sources are at all reliable. This is how the City has created its major traffic dilemmas it now faces.

27.23

For years, the City has approved commercial expansions within and nearby the Bel Aire Plaza while assuming that State funds would pay to mitigate for traffic impacts through construction of a Trancas Street overpass. The result is the most dangerous and heavily impacted (SR 29 x Trancas) intersection in the City.

The DGP purports to encourage bicycle use. Unfortunately, there is no implementation program for this mitigation, and no identification of funding responsibility, or potential. At this point we have to expect that the City is not serious about boosting bicycle use.

27.24

The DEIR states that the "transportation system is well developed and is built out to its maximum requirement in most locations." (p. 3.3-1). The DEIR fails to provide data to substantiate this claim, so it would appear to be a subjective observation. Many in the community would disagree with the claim that the City has a well developed transportation system.

27.25

**Impacts of mitigation measures themselves are not considered.**

The DEIR does not analyze the impacts that road widenings and roadway connectors would have on neighborhood character. This preservation of neighborhood character is held by the DGP as one of the most significant local issues, yet it seems to be passed over as unimportant in the DEIR. Similarly, traffic calming measures in neighborhoods are not defined and no attempt is made to disclose the impacts they may cause.

27.26

In regards to public transportation, policy T-5.2 states that "bus routes should be located within ¼ mile of 85% of city residences" to mitigate for aspects of the project. (p. 3-19). The DEIR states as fact that this goal is currently met by the City's bus system. However the DEIR fails to provide data to support this assertion. For instance, many Browns Valley residents are further than ¼ mile from the nearest bus stop.

27.27 In addition, the DEIR fails to discuss the efficiency of the City's bus system. For example, it can take approximately 1½ hours to travel by bus from Salvador Elementary School to Browns Valley Elementary School. The same trip may take 10 to 15 minutes by private vehicle. It would seem, then, that the public transportation system fails to provide mitigation for the impacts of this plan in at least some instances. The DEIR must provide a more critical analysis of the City's public transportation system, and identify and analyze DGP impacts on the system. An increase in efficiency may encourage more motorists to use public transportation. We would like to see policies aimed at developing a more efficient public transportation system.

27.28 The DGP Policy T-10.1 encourages owners of rail lines to maintain their systems as a mitigation measure to transport goods, and eventually people. The impacts of this policy deserve discussion in the DEIR for its potential to mitigate impacts of this plan including, but not limited to, increased resident and tourist traffic in and out of the Napa Valley.

**We request the following New Policies and Policy Changes and Additions.**

27.29 ♦ New Policy \_\_\_\_

The City will require that all public and private projects that may impact river and creek habitat undertake measures to avoid or fully mitigate for potential impacts to river/creek bed and tree/plant canopy.

27.30 ♦ New Policy \_\_\_\_

The City shall create a model shuttle system designed to transport large numbers of tourists to the downtown or other areas of the city where major overnight and entertainment accommodations are provided. The goal of the system will be to accommodate a large number of tourist visitors into the city without major increases in traffic or needs for roadway improvements.

27.31 ♦ New Implementation \_\_\_\_

The City shall, in cooperation with the CMA, promote the creation of staging areas on the south edge of the city and provide incentives for tourists to take transit or shuttle buses to their destination hotels in or near downtown Napa. Shuttle services to the up valley areas will also be promoted from overnight facilities within the City.



## C. COMMUNITY SERVICES AND UTILITIES

### a. Police and Fire

#### **Findings of insignificance are not supported.**

The DEIR impact analysis indicates that proposed RUL extensions will not lead to increased response times. However, this assertion is not based on any data provided in the DEIR.

The Stanly Ranch development would require police and fire service for an extensive resort complex and around 550 housing units, representing a large increase in service demand. Yet the DEIR states that demand will not significantly increase since the Stanly Ranch is "within the RUL and existing beat structures." (p. 3.4-5, #1). The assumption, that service to a heavily populated area is the same as to a large undeveloped property, is not supported by any analysis and certainly makes no intuitive sense.

27.32

#### **Analysis is insufficient to support conclusions.**

The DEIR also fails to analyze the potential need for police services on Napa State Hospital (NSH) property once it is annexed to the City. It is assumed that NSH police would continue to cover the area themselves, again with no analysis to support the assumption. The City police department will likely become responsible for at least part of the service area of current NSH property. On-going negotiations that would result in the sale of NSH property for development would require city services be established. The impacts on increased fire and police response times to the NSH property must be addressed in this DEIR.

Impacts of increased fire service to the RUL expansion area west of Foster Road are not analyzed in this DEIR. Due to the existing problems with low water pressure, impacts of additional development could further reduce water pressure in the area. This could have significant adverse impacts on fire service. The EIR should address the water pressure limitations in this area and explain how the DGP mitigates for significant adverse impacts on fire service to the RUL expansion and surrounding areas.

27.33

### b. Water Supply

#### **Assumptions are not supported.**

The current DGP mitigations of adverse impacts on the City's water supply are vague and wholly inadequate. The Environmental Assessment #3 in this section of the DEIR assumes that the DGP "would not result in demand in excess of the City of Napa's water supply system." (p. 3.4-6). However the following discussion admits that this is not the case in times of multi-year droughts. It

27.34

follows by stating that multi-year droughts are not expected to be a significant impact because "water entitlements from the State Water Project (SWP) are growing significantly faster than projected growth in water demand in the City." (p. 3.4-6). Below that we learn that "periodic, unresolved environmental problems in the Sacramento River Delta ... make the reliability of the SWP entitlements unpredictable." (p. 3.4-6). It would appear that the City's water supply is indeed vulnerable. The potential impacts of increased growth with reduced SWP water supplies must be identified, analyzed and mitigated.

27.34 Mitigation measures in Goal CS-9 anticipate multi-year droughts, but only implement the Water System Optimization and Master Plan. Implementation programs are not provided for the remaining policies under the goal (p. 4-11,12). The Master Plan is not explained in the DEIR and its funding mechanism is missing. In fact, the City Council eliminated the latest strategy to pay for the Master Plan implementation due to public outcry. Thus, the City is currently left without a plan to mitigate for growth impacts on water supply. The DEIR must provide this information to minimize cross-reference to other documents as required by CEQA, and more importantly, so the entire community may be aware of the City's potential water supply predicament.

The impacts of providing water service to the RUL expansion area west of Foster Road are not disclosed. The City is aware of the problems of low water pressure in this area. Additional development can be expected to further worsen the water pressure problem. Impacts should include, but not be limited to, requirements for additional water system infrastructure to serve this area.

27.35 The DEIR asserts that the policies and implementation programs of the DGP will mitigate impacts of increasing wastewater treatment, storage, and disposal. These impacts will be mitigated primarily through additional facility construction and greater surface applications of partially reclaimed water. However, the DEIR fails to identify and analyze impacts of increased waste water treatment facilitates and surface applications of effluent. Potential impacts such as greater outflow to the Napa River in wet months, higher storm water flows into existing and new facilities, increased pond capacity, lower outflow in the dry months, and expanded surface applications must be addressed. The DEIR makes a cursory review of impacts, stating that impacts "may be significant ... if development occurred in areas outside the planned sewage service boundary." (p. 3.4-4). However, no attempt is made to identify, analyze, nor mitigate the impact.

### c. Trail Development

27.36 Without analysis or identification of potential impacts, the DEIR states that construction of the proposed trail system may have impacts on sensitive biological resources. We agree, and add that potential soil erosion, stream bank degradation, fish and wildlife disturbance, downstream sedimentation effects,



etc., may be significant and adverse. Later in this document we offer stronger mitigation measures to ensure a lower level of impact.

27.36

#### **d. Visual Quality**

##### **The presumed effectiveness of mitigations is not supported.**

The location of the two southern gateways are arbitrary and inappropriate. Heading north to the Napa Valley, travelers obtain their first perceptions of the City from the "Southern Crossing" State Route (SR) 29 bridge over the Napa River and at SR 221 by Soscol Ridge. It is here that the City and the Valley are revealed. It is here that our community will be best served by maintaining high visual quality standards.

The development proposal of Stanly Ranch has potential significant adverse impacts on the visual quality, scenic corridor, and gateway features of the City, and is in conflict with Policy LU-1.6 that protects SR 21 and SR 29 as scenic corridors. The Ranch is visible from the Southern Crossing and from SR 12-121. The visual impacts of Stanly Ranch development are not identified nor analyzed in the DEIR. We believe that the development proposed for Stanly Ranch is not in keeping with the current visual character and identity of the area. We submit that this proposal would be a significant adverse impact as defined in the DEIR Significance Criteria, in that it "results in a substantial, demonstrable negative aesthetic effect, such as obstruction of a scenic vista or the creation of an aesthetically offensive site open to public view." (p. 3.6-2).

27.37

Additional residential development of the RUL expansion area west of Foster Road would create very visible development on open, steep hills. The visual impact significance of the hillsides is dismissed as insignificant by the DEIR. Surely this is a controversial and subjective decision. Development of nearby hillsides at Westwood Hills Park has been controversial for years, the subject of numerous public reviews, news paper articles, and public letters. Despite this, the DEIR ignores significant adverse impacts of aesthetically offensive housing development on hillsides. Visual impacts that may result from development of lands of the State Hospital must also be considered in the DEIR.

##### **We request the following changes to the visual gateway locations and mitigation measure.**

###### **◆ Figure 1-3: Visual Gateways**

Relocate the SW gateway area south to the junction of 12/121 & 12/29 and extending south past the Stanley Ranch and east to the Southern Crossing.

Relocate the SE gateway area south to the 12/29 & 221 junction to the southern crossing and extending northward.

27.38



(policy changes and additions are printed in **bold** and underlined)

27.39 ♦ Policy LU-1.5

The City shall refine the locations and concept of the key gateways to the city identified in Figure 1-3, and shall establish gateway and scenic corridor guidelines for both public and private development to ensure attractive entrances to the City. **The visual gateways shall incorporate green ways, open space, riparian corridors, and wetland areas.**

D. AIR QUALITY

**The findings of insignificance are not supported.**

27.40 The DEIR does not address current air quality conditions and the scientific evidence that air quality standards in locations such as the Bay Area are not protecting public health. New EPA proposals may increase the standards for air quality as soon as June of 1997. The DEIR must disclose the air quality impacts of development as proposed in the DGP.

The DEIR also relies on policies to mitigate for undefined air quality impacts. But the policies are not definite enough to be reliable. For instance, bicycle lanes are proposed to meet the standard of compliance with the regional air quality plan. But policies of the DGP also allow the requirement for bike lanes to simply be discarded at the discretion (or whim) of the City Council. This cannot be relied on to mitigate for any project impacts, and is not acceptable.

E. BIOLOGICAL RESOURCES

**The policies identified as "mitigation measures" to protect sensitive environmental areas are often vague to the point of making them ineffective as mitigations.**

27.41 The DEIR acknowledges the sensitive nature of salt marsh species, and without analysis asserts that policy measures in the DGP mitigate any significant impacts. The DEIR simply references policies and implementation programs and assumes that these will mitigate any significant adverse impacts. The DEIR fails to show how adverse impacts of development in these very sensitive areas will be mitigated. Moreover, as mitigation the DEIR refers to policy LU-9.2 that says "The City shall continue to apply special development standards" yet makes no attempt to identify these standards. Undefined development standards cannot be expected to mitigate anything. These proposed mitigations are vague and would circumvent public disclosure of the impacts on salt marshes due to implementation of the DGP. These "special development standards" must be identified in this DEIR.

We agree with the DEIR when it states that "Potential impacts ... can be avoided by not developing any portion of a jurisdictional salt marsh." (p. 3.7-8). This is not secured by designating salt marshes and other sensitive environmental areas as Public Serving (PS). In fact, the PS designation proposed would allow an array of public facilities with a floor-area-ratio (FAR) of 0.40, potentially allowing 40% of these rare and vital areas to be developed. This would indeed be an adverse significant impact.

27.41

Here again, the creation and application of the Resource Areas (RA) land use designation would provide a mechanism for mitigating potential impacts. Incidental improvements such as trails, visitor centers, rest rooms, etc., could still be considered appropriate in these areas. Sensitive environmental areas, including remnants of native vegetation, within the RUL should receive substantial protection offered by this new land use designation.

**We request the following New Policies and Policy changes and additions:**

◆ New Policy \_\_\_\_

The City shall identify and shall seek to reestablish, improve, and restore wildlife corridors reaching into and beyond the urban city zones by creating contiguous wildlife habitats wherever feasible. The corridors will serve as habitat zones for resident species and pathways for migrating species.

27.42

◆ New Implementation \_\_\_\_.

The City shall revise its ordinances to, in all circumstances, avoid disturbances by public or private development projects within 100 ft. of river or creek bands. In situations where such disturbances are unavoidable, the City will require that channel disturbances occur during the season of least impact and that measures are taken to fully reestablish tree canopy and other creek bed features as quickly as possible.

27.43

◆ New Implementation \_\_\_\_.

The City will develop and implement a new wildlife corridor overlay district and ensure that all development within designated wildlife corridors provides for protection or reintroduction of local species of plants, birds, fish and other animals, and accommodates the migration of birds and other wildlife. Wildlife corridors may be designated on public or private lands along the river, its tributaries, in public parks and spaces, and along bike paths or train tracks wherever feasible. Landscape and mitigation areas within the district shall prioritize the establishment of endemic species of highest habitat value.

27.44

◆ New Policy \_\_\_\_

27.45

The City shall protect existing wetland resources and support the re-establishment and/or restoration of wetlands where feasible. The City shall, in all circumstances, seek to prevent the encroachment, degradation, filling or other alteration of jurisdictional wetlands. In situations where adverse impacts are unavoidable, science-based wetland mitigations shall be designed to fully replace wetland value and result in no net loss of acreage.

27.46

◆ New Policy LU-4.12

The City shall require new residential development to enhance, restore, and where practical, expand remaining riparian and wetland areas.

27.47

◆ New Policy LU-4.13

The City shall require that new development on the City fringe pay the full marginal cost of the development. This will provide economic incentive for new development within the City center, and around the downtown area, and ensure that new development on the fringe bear its true cost.

(policy changes and additions are printed in **bold** and underlined)

27.48

◆ Policy LU-6.4

The City shall promote river front development that reorients downtown to the Napa River and shall encourage creative designs during the development review process **that address the environmentally sensitive, threatened and endangered species, as well as functional floodplain characteristics.**

27.49

◆ Policy LU-9.3

The City shall **require** the maintenance of wildlife corridors and **prohibit** the fragmentation of large natural plant communities when environmentally sensitive sites are developed.

27.50

◆ Policy LU-9.4

The City shall **discourage development in high priority environmentally-sensitive areas by requiring cluster forms of development and requiring amendments to project designs where appropriate.**

27.51

◆ Policy LU-9.5

When proposed development within the density ranges prescribed by the underlying land use designation is inconsistent with conservation of critical environmental resources, the City Council **shall** reduce the project size, scale, or density (to less than the minimum density) provided the City Council makes one or more of the following findings: (the remainder of this policy remains unchanged)



We wish to emphasize here that many proposed policies contain good ideas. However, many are not assigned implementation programs. The City must provide language to actually implement these policies if they are to serve as mitigations.

27.52

Additional policy changes include:

◆ Policy NR-1.3

The City shall **require** the planting of native plant species in natural habitats

27.53

◆ Policy NR-1.4

The City shall review all future waterway improvement projects (e.g. flood control, dredging, private development), as well as all projects that are within **1/4 mile (to account for flood dispersal areas and wetlands)** of the waterway, to ensure that they protect and minimize effects on the riparian and aquatic habitats. The City shall also **require** native plantings along the river and creek banks to stabilize the banks, reduce sedimentation, reduce storm water runoff volumes, **increase between-storm stream flows through greater recharge, provide valuable wildlife habitat throughout the year,** and enhance aquatic habitats.

27.54

◆ Policy NR-1.6

The City shall require as a condition of approval that development provide protection for significant on-site natural habitat ("whenever possible" stricken). If such habitat cannot be avoided due to **demonstrated economic hardship**, the City would permit equivalent, **science-based,** mitigation off-site. **In the case of residential development, the City shall perform this review during the subdivision process.**

27.55

◆ Policy NR-1.7

During development review, the City shall ("endeavor" stricken) identify and protect significant species and groves or clusters of trees on project sites

27.56

## F. GEOLOGY, SOILS, AND SEISMOLOGY

**The DEIR ignores its own standards and mitigations to justify findings of insignificance in exposing people and structures to hazards.**

The DEIR gives a cursory evaluation of hazards to people and property caused by development in high risk areas. The DGP accommodates a cluster of residential development of around 550 housing units and a resort hotel in the Stanly Ranch, an area vulnerable to "very violent" ground shaking intensity from

27.57

27.57 the West Napa Fault. (Figure 8-1A, p. 8-3). DGP policy HS-1.2 is the mitigation measure. However, the policy is intended to "discourage siting of facilities necessary for emergency services, major utility lines and facilities" and likewise discourages "high occupancy structures." (p. 8-2). These are to be discouraged within areas subject to very strong, violent or very violent ground shaking. The mitigation is invalid since the DGP land use designations provide for those very uses on the Stanly Ranch.

27.58 Several other areas are given land use designations inconsistent with the DGP policies which are supposed to mitigate for impacts. The "Giovannoni peninsula", a small spit of alluvium soil in the Alta Heights Planning Area is designated "MU", allowing from 10-40 units per acre, though this soil type is described as most susceptible to liquefaction. The finding that those risks are mitigated to a level of insignificance has no basis.

27.59 The DEIR also provides no analysis to support its finding that construction of residential homes on slopes of 30%, as would take place within the RUL expansion area west of Foster Road, can be mitigated by the policies offered in the DGP. We request the identification and analysis of impacts.

#### H. HYDROLOGY AND WATER QUALITY

27.60 The DGP policy HS-3.9 actually enables increased floodplain development if an adequate and affordable flood control project is not agreed upon by the year 2000. It is not in agreement with the expressed natural resource objectives of the DGP. In fact, it is dangerous. Allowing floodplain development exposes additional life and property to flood dangers, and irresponsibly increases flood risk down stream. To meet natural resource and health and safety objectives, development in the floodplain must be avoided and riparian and wetland areas must be protected and restored when possible.

In general, measures to mitigate impacts of the DGP on flooding are inadequate.

#### We suggest the following changes:

##### ◆ Policy HS-3.2

27.61 The City shall continue to apply flood plain management regulations for development in the 100 year flood plain and floodway, **and require that new development show how it will affect downstream flows and flood potential.**

##### ◆ Policy HS-3.6

27.62 The City shall support **alternative** programs and methods to reduce the flooding of the Napa River and its tributaries **in a manner that that maintains, to the greatest extent possible, the natural functions of the Napa River using the most cost-effective solutions.**

◆ New Policy HS-3.10

The City shall require that flood control channels be kept in functioning condition. Tree cover on channel banks will be used to control in-channel vegetation growth unless physical limitations or constraints require alternate plans.

27.63

We believe it worthwhile to investigate the possibility of combining restoration and flood control efforts. Parks, trail areas, riparian areas, and constructed wetlands could all serve as temporary relief basins or wide outs to slow flood waters and prevent flooding down stream. Golf courses may be used in a similar manner.

27.64

### III. CONCLUSION

The Sierra Club Napa County Group finds that the policies and programs listed as mitigations in the DEIR cannot lead to attainment of the environmental and quality of life goals proposed in the DGP. We reach this conclusion by noting that the DEIR:

- ◆ does not adequately identify and analyze impacts of the DGP
- ◆ mitigation measures are often inadequate and vague, and
- ◆ fails to fully disclose potential impacts of RUL expansions and the Stanly Ranch and Foster Road developments.

In essence, mitigation measures in the DGP are so indeterminate and the DEIR so abstract that we cannot agree with the DEIR when it states that there are not significant impacts anticipated from adoption and implementation of the DGP due to the self-mitigation nature of the DGP. (p. S-4).

We urge the City to revise the DGP to avoid heavy mitigation and to develop a true "confined city policy" that also protects and restores wildlife habitat within the city.







# NAPA COUNTY

GENERAL PLAN COMMUNICATION # 28

## CONSERVATION, DEVELOPMENT and PLANNING DEPARTMENT

Jeffrey Redding  
Director

1195 Third Street, Room 210 • Napa, CA 94559-3092  
Telephone 707/253-4416 FAX 707/253-4336

November 21, 1996

John Yost, Planning Director  
City of Napa  
1600 First Street  
Napa, California 94559

Re: City of Napa Draft General Plan and EIR--Addendum #1 and #2/Errata Sheet

Dear John:

This letter is in response to your November 18, 1996 transmittal of Addendum #1 and #2 and, the errata sheet, to the draft General Plan documents that we received today. This letter is intended to supplement the two comment letters that were hand delivered to your office on November 18, 1996, each relating to the draft General Plan and draft EIR.

### Addendum #1

The draft policy document should be amended to include policies to ensure that the future project to be constructed on this site will be compatible with the adjacent County zoning designation (i.e. Agricultural Preserve), the designated Silverado Trail scenic corridor and Milliken Creek which forms the eastern boundary of the site.

28.1

The EIR must also be revised to address impacts associated with this project. Traffic is of particular concern and the following intersections must be evaluated as part of the draft EIR: Trancas Street/Silverado Trail intersection, Oak Knoll Avenue/Silverado Trail and intersections further north. The traffic analysis must take into account regional traffic growth and cumulative impacts, accounting for both city and county projects. We question the conclusion on page 3.3-4, Table 3-3.2 that, with the hotel complex, the LOS at the Trancas Street/Silverado in the year 2020 will remain at LOS C.

28.2

### Addendum #2

We want to remind you that certain lands south of the City, east of Highway 221 are designated as 'urban' on the county general plan. This Addendum and Exhibit C should reflect this fact. We would it if you would review the text and Exhibit C to ensure that county urban lands are not included as greenbelt lands.

28.3

Errata #1

28.4

We would like to urge you to consider add programs and implementation within the Housing Element reflecting a commitment by the city to enter into a joint program with the county to share housing credits as envisioned under Valerie Browns Assembly Bill 3456. Our letter of November 18, 1996 includes some additional suggestions for the housing element that we hope you will consider.

Thank you for this opportunity to comment.

Sincerely,

  
Jeffrey Redding  
Director

cc: Board of Supervisors  
Jay Hull, County Administrator  
Robert Westmeyer, County Counsel (with addenda and errata sheet)





GENERAL PLAN COMMUNICATION # 29

# NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559  
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON  
Executive Officer

November 26, 1996

Deborah Faaborg, General Plan Project Manager  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559

Subject: Comments on the Proposed Addenda to Draft City of Napa General Plan  
Environmental Impact Report

Dear Ms. Faaborg:

This office acknowledges receipt of Addendum #1 and #2 to the Draft City of Napa General Plan transmitted in your letter dated November 18, 1996. Your transmittal also provided notice of extension of the public comment period for the Draft EIR to Monday, December 2, 1996. Based on review of the two addenda with the Draft EIR, the following additional comments are submitted:

## ADDENDUM #1 - RUL ADJUSTMENT:

Addendum #1 would modify the Residential Urban Limit Line (RUL) to include a five acre parcel located on the northeast corner of the Trancas Street and Silverado Trail intersection. The proposed General Plan Land Use Designation is TC - Tourist Commercial.

The Draft EIR fails to assess adequately the environmental aspects and impacts of the proposed urbanization of this area. The following environmental impacts of Addendum #1 need to be analyzed fully in the Draft and Final EIR:

29.1

Deborah Faaborg, General Plan Project Manager  
City of Napa Planning Department  
November 26, 1996  
Page 2

**Growth Induction:**

The proposed urbanization of this area, including the extension of urban infrastructure and public services, should be evaluated for its growth inducing impacts to adjacent land in agricultural and open space use.

**Cumulative Impacts**

The Napa County Local Agency Formation Commission currently has an annexation application on file to annex this parcel to the Napa Sanitation District. The application notes that a development project has been filed with the City of Napa to develop a "Winery/Hotel" on this parcel. The application was deemed "incomplete" pending completion of the required environmental document by the City, lead agency under CEQA for the development project. The General Plan Draft EIR must evaluate the environmental impacts associated with the proposed development project for cumulative impacts.

**Alternatives Section:**

The Alternatives Section should evaluate alternative land use designations for the subject territory which would be compatible with the surrounding agricultural or open space land use. A second consideration for analysis is the detachment of this isolated detached area from the City.

**ADDENDUM #2** - No comments are being submitted.

Very truly yours,



Charles Wilson  
Executive Officer

cc: Chairman John Brown and Members of the Commission  
Margaret Woodbury, LAFCO Counsel

December 2, 1996

John Yost, Planning Director  
City of Napa, Planning Department  
1600 First Street  
Napa, Ca 94559-0660

DEC

RE: Comments on City of Napa General Plan Draft EIR

Dear Mr. Yost;

It does not seem that this DEIR for the envision NAPA 2020, City of Napa General Plan is ready to be passed by the City Planning Commission at this time. It is inundated with inadequacies, pertinent information is not readily accessible, or it has not been sufficiently proofread. Many of the comments do not complete a logical thought such as on page 2-10, under Economic Development. The second sentence seems to imply that this "Draft General Plan will attract higher paying technical and professional jobs," ... "such as Auto Row" and then the sentence is left dangling. Can you explain what was meant on this page? And, is it possible to have someone check for other apparently misleading information?

30.1

On page S-1 we are told that the General Plan Update process began in 1991, a period of five years. It is to be implemented for a period of at least twenty years. On page I-2 we are told that we would have 45 days for public review. Though, the Nov. 18th deadline was extended by two weeks, it seems imperative that a document that has taken so much time to prepare and will affect the life of such a vast array of people be open to public scrutiny for a longer period of time; can you explain why this is not possible?

30.2

Page S-5,6 Under the Alternatives To The Project, discussion mentions the City's *Futures Report*, (January 1990), whereby a number of other alternatives were rejected; where may the general public access these reports?

30.3

Page S-7 Under Reduced Growth Alternative 1: No Growth, fourth paragraph: "a long -term moratorium on growth" or the "No Growth Alternative...would improve the City's job/housing ratio." therefore, "it is rejected as a practical alternative." Wouldn't an improvement in the job/housing ratio be a good thing for the Napa community? A

30.4



30.4 ↑  
practical alternative would seemingly be a justifiable solution, can you explain why it is not?

30.5  
Pages S-7, S-8 Reduced Growth Alternative 2: Decrease Housing City-Wide, though it seems that there would be a moderate reduction in air emissions, noise, and community service demands this would not preserve existing residential character, but in actuality would create "greater impacts in certain areas," ... can you explain how having less homes will increase air emissions, noise, increase community services or decrease the ambiance?

30.6  
Page S-8 With Reduced Growth Alternative 3: Selective Decrease in Housing paragraph three, at: "and (3) creates pressures to redevelop older areas with historic buildings." Historic buildings are already in existence. So, with the above quotation, do you mean to imply that with selective decrease in housing our historic buildings would have to be demolished and replaced with new buildings?

Thank you  
Susan Rushing Hart

Louise Clerici  
4032 Wisteria Way  
Napa, CA 94558  
December 2, 1996

DEC 11 1996

GENERAL PLAN COMMUNICATION # 31

Mr. John Yost, Planning Director  
Planning Department  
P.O. Box 660  
Napa, CA 94559

Dear Mr. Yost:

I have reviewed the August 16, 1996 draft of the City of Napa General Plan. Listed below are my comments and questions.

#### STATEMENT

Page 5, right hand column, 1st paragraph, line 8: "The City Council adopted a new general plan in 1975, less than two years after the plebiscite. Consistent with the advisory ballot measure, the plan projected a year 2000 population of up to 75,000 "

#### Comment:

The ballot measure read: "(D) The City of Napa now has a population of 40,000 people. If the City is to grow, what do you think would be a size city you would like Napa to become?"

31.1

Five choices were given. The first one was Santa Rosa (75,000 people). Out of the five choices this one received the most votes. No where on this ballot was the year 2000 mentioned. Therefore, to be historically correct the words "consistent with the advisory ballot measure" need to be eliminated. The sentence should read "The plan projected a year 2000 population of up to 75,000."

#### STATEMENT

Page 14, right hand column, 5th line from bottom: "This General continues . . . "

#### Comment:

The word "Plan" needs to be inserted between the words "General and continues".

31.2

#### STATEMENT

Page 16, right hand column, 3rd paragraph: "The following definitions describe the nature of the statements of goals, policies, standards, implementation programs, and quantified objectives as they are used in this document:"

#### Comment:

Definitions are given for the words Goal, Policy, Standard, Implementation Program. There is no definition for the words "Quantified Objectives". It would be very helpful to the lay person reading this document to have this definition. It is a planning concept. Many people do not understand its meaning.

31.3

#### STATEMENT

Page 1-10, LU-1.B: "The City shall revise the Zoning Ordinance to include a Scenic Corridor Overlay Zone . . . Time Frame: FY 02-04"

Page 1-14, LU-4.A: "The City shall revise the zoning Ordinance to conform to the land use intensity and residential pattern . . . Time Frame FY 98-00"

31.4

#### Comment:

Shouldn't these be done in the same time frame?

## 5. STATEMENT

Page 1-13, Table 1-3, Line 1: "Type A - characterized by uniformity in platting patterns .

Comment:

Please include the word "platting" in the Appendix A Glossary of General Plan Terms as this word appears many times throughout this General Plan.

## 6. STATEMENT

Page 1-14, LU-4.2: "The City shall allow . . . single room occupancy units in residentially-designated areas, when they meet the standards for development that protect neighborhood character. "

Comment:

What are the standards for development that protect neighborhood character?

## 7. STATEMENT

Page 1-16, LU-5.2 "C": To reduce the impacts of existing commercial uses on crucial corridors and other major streets, the City may not allow . . . "

Comments:

Typographical error - the word "may" needs to be substituted.

## 8. STATEMENT

Page 1-26, right hand column, 5th paragraph: "This designation provides for detached and attached single family homes, secondary residential units, planned unit and cluster developments, duplexes, triplexes, mobile homes, manufactured housing . . . "

Comments:

Your definition (Page A-13) of attached single family home mentions as an example a duplex and townhouse. I believe a triplex would be another example. As stated on Page 1-26, what are some other examples of attached single family homes?

## 9. STATEMENT

Page 2-10, Review and Update of the Housing Element, first paragraph, last line: ". . . next revision due by June 30, 1999."

Policy H-6.2: "As required by State law, the City shall complete a comprehensive review and update of the Housing Element . . . in 1995."

Comment:

Policy H-6.2 needs to be revised to reflect when the next revision of the Housing Element is due.

## 10 STATEMENT

Page 5-7, PR-1.4, Line 6: "The service area for community parks is a  $1\frac{1}{2}$ -2 mile radius oatchment"

Comment:

What is the meaning of the word "oatchment"? This same sentence also appears on page F-2, Pr-1.4. Please include this word in Appendix A Glossary of General Plan Terms



## 11 STATEMENT

Page 8-1, right hand column, 4th paragraph, Line 9: "The poorly consolidated younger alluvium that occupies areas south of the city and along the Napa River are considered to have high to very high potential for liquefaction."

Comment:

It would be helpful to developers and people buying homes to have a map showing these areas of high to very high potential of liquefaction, such as shown in Figure 8-1A thru Figure 8-11.

31.11

## 12 STATEMENT

Page 8-13 Conn Creek Dam, Line 4: "The crest height is 125 feet and the reservoir stores 31,000 acre-feet of water. If the Conn Creek Dam were to fail, inundation waters would arrive at the north city limits in  $4\frac{1}{2}$  hours with 16-foot maximum water depth at Trancas Street."

Page 8-14 Milliken Reservoir, Line 3: "The crest height is 110 feet and the reservoir stores 2,000 acre-feet of water. If Milliken Reservoir dam were to fail, innundation waters would reach the northeast city limits in one hour with a 16-foot maximum water depth at Trancas Street."

31.12

Comment:

How can the 2 dams produce the same amount of water at Trancas St. when the capacity of each dam is very different? Please verify these figures.

## 13 STATEMENT

Page 8-21, HS-6.3: "The City shall restrict land uses within Zone D that would create increased hazard risks (e.g., low mobility, highly sensitive to noise) in accordance with the criteria provided in the ALUCP."

31.13

Comment:

Please define and give an example of what is meant by "low mobility" as used in this sentence.

## 14 STATEMENT

Page 8-27, Table 8-1: "Land Use Compatibility For Community Noise Envoronnments"

Comment:

Typographical error - The correct spelling is environments.

31.14

## 15 STATEMENT

Page C-1 Appendix C, Development Likelihood Factors: "During the residential capacity analysis every parcel in the city's RUL was reviewed for residential potential. The vast majority of the over 20,000 parcels scanned did not meet the minimum criteria for further analysis."

31.15

Comment:

What was the minimum criteria that was used to determine if further analysis was necessary?

## 16 STATEMENT

31.16 Page C-2 Typology Type B - Existing pattern: "Hillside and floodprone tracts are analyzed on a site specific basis. In all other cases, development of estate parcels exceeding the typical median lot size established in the area occurs in conformance with the surrounding net density and type pattern . . ."

Comment:

Please include the word "median" in Appendix A Glossary of General Plan Terms. This calculation was used frequently in the residential capacity for each planning area which appeared in the March 1994 Concept Report.

## 17 STATEMENT

1.17 Page C-5 Appendix C, right hand column, 2nd paragraph: "With the exception of the Linda Vista specific plan area . . . a single capacity scenario was generated for each of the zoning study areas. When a larger study area included "map reference areas" (MRA), it was assumed the zoning pattern of the MRA determined its potential capacity."

Comment:

What is a "map reference area?" Please give an example as it was applied in this sentence.

## 18 STATEMENT

1.18 Page C-6, Appendix C "Areas That Create Their Own Identity", Line 9: "The map at the end of this appendix shows the areas that were analyzed as well as those that weren't."

Comment:

This map was left out, please include it.

## 19 STATEMENT

1.19 Page F-1, Appendix F, LU-9.5 (b): "The site has specific environmental or cultural resources . . . that would be adversely affected by a projected developed at the minimum densities prescribed by the General Plan;"

Comment:

Typographical error - the word "project" needs to be substituted.

## 20 STATEMENT

1.20 Page G-2, Appendix G, Acknowledgements: "Community Resources Department - Heather Standon, Director"

Comment:

Typographical error - Heather's last name is spelled "Stanton".

Yours truly,

*Louise Clerici*

Louise Clerici

# Charles W. Shinnamon, P.E.

GENERAL PLAN COMMUNICATION #32

1541 Third Street  
Napa, California 94559

Telephone 707-252-3367  
Fax 707-224-3938

December 1, 1996

Ms. Deborah Faaborg  
Mr. John Yost  
Napa City Planning Department  
1600 First Street  
Napa, CA 94559

DEC

Re: General Plan EIR

Dear Deborah and John:

The following are comments and questions I would like to submit for the record and to have answered as part of the EIR process:

- Traffic: Given that most of us experience growth through the amount of traffic it may generate, I think that it is vitally important to clearly address how traffic is going to be handled over the next 24 years that are envisioned by the General Plan. I am concerned that the DEIR covers vitally important issues with a minimum of detail or discussion. Some of the mitigation measures and / or assumptions seem unrealistic to me:
  - The stipulation that Soscol from Imola to Lincoln will be widened with six lanes (Pg. 3.3-6) at some future point is hard to fathom. I understand Dowling Associates' need to make assumptions for their modeling in order to present a coherent plan. This one is not acceptable to me as a mitigation measure nor as an assumption for the traffic model; I doubt that the rest of Napa would accept this either. This issue needs to be addressed in more detail, perhaps with a different set of assumptions.
  - Table 3.3-3. Although they are nice dreams to include in the model, I suggest that the Linda Vista Ave. bridge (#7) and the Solano Ave. bridge (#8) be removed from this list of assumptions for the purpose of creating the model. At least we'll know the impacts of traffic without these improvements being made. They have been in the City's wish list for many years and probably will remain so. Let's make sure the model works without them.
  - I found the issue of the Congestion Management Plan and its applicability very confusing. I found the letter from the CMA (Appendix C) very difficult to understand and don't understand the discussion of how the General Plan model should or shouldn't fit into the CMP model. I would appreciate clarification.

32.1

32.2

32.3



32.4

- Although part of City-County cooperation is political and is hard to address in an EIR, I think that it is imperative that there be discussion of how the traffic generated from the Airport Area Specific Plan will impact the City. My purpose is not to suggest that the Airport development not happen but rather that there be some thoughtful discussion and mutual planning between the City and County and their consultants.

- Land Use:

32.5

- I understand from others that the General Plan may overstate the amount of developable land available within the RUL for commercial and industrial development. If this is true, how will the City accomplish its goal of shifting its own jobs/housing balance within the RUL? Are there impacts, then, that have not been addressed?

32.6

- I realize that the DEIR is not the appropriate place to discuss projections of future residential development quantities but I have a hard time visualizing, as an example, another 1277 homes in the Linda Vista Planning area (Table 2-3). I understand that these projections occurred in the early 1990's and that there has been some building that has taken place. Nevertheless, I don't recognize where these homes will be built in the quantities projected. If this is true, what impacts are there, especially related to the jobs/housing balance?

The General Plan and DEIR are complex documents and will require more review on all of our parts. I regret that I have only had the time to prepare the above comments.

Sincerely yours,



Charles W. Shinnamon, P.E.

Mark D. Brewer  
P. O. Box 866  
Glen Ellen, CA 95442  
707/996-9900

DEC 11

City of Napa Planning Department  
Attn. John Yost  
1600 First Street  
Napa, CA 94559

Rec'd Fax 12-2-96

Re: Draft E.I.R. comments  
General Plan Update

December 2, 1996

Mr. Yost:

I am the principal owner of 7.3 acres of land at 404 Silverado Trail, with additional frontage on Capitola Way. The easterly third of my parcel (APN 46-060-04) is currently zoned for medium density single family housing, with the burden of accommodating a portion of a connector street from Souza Lane to Liberty Way to meet traffic circulation requirements. The rest of our parcel is zoned for higher density multi-family housing.

Please be aware that, in view of staunch opposition on the part of existing homeowners in the area to any east-west traffic connection, we oppose the requirement of a Souza Lane extension (policy #T-1.9b).

33.1

In addition we oppose any down-grading of zoning on our property, particularly in view of the stated goals (H-1 and H-1.3) of maintaining sufficient housing opportunities in Napa.

33.2

Sincerely,



Mark D. Brewer

MDB:mm





Rapa, California  
December 2, 1996

GENERAL PLAN COMMUNICATION # 34

City of Rapa  
Planning Department  
1600 1st Street

Attention: John Yost

DEC 1996  
RECEIVED  
City of Rapa  
Planning

The new proposed general plan for the City of Rapa apparently still has no map of the Redevelopment Agency 33 blocks, 324 acre area of Rapa downtown; though the agency has an outdated plan the proposed general plan does not address the many changes made to the area in spite of this old plan, nor does it address the future plans and changes that the agency might be contemplating.

Because of this omission, the environmental effects of the changes cannot be addressed directly.

Doesn't the omission of the impacts of plans and maps make this general plan inadequate?

Sincerely,

M. Lagioni

34.1



GENERAL PLAN COMMUNICATION #35

221 Winding Way  
Napa, CA 94559  
November 29, 1996

DEC 1

John Yost  
City Planning Department  
1600 First Street  
Napa, CA 94559

Re: Draft General Plan EIR

Dear Mr. Yost:

I have only had a brief amount of time to review the General Plan EIR but would like to make some comments, primarily in relation to the Stanly Ranch. I understand that the Stanly Ranch was designated in the 1982 General Plan as a Study Area and that the owners had to then make their case for development. The Draft General Plan and EIR basically give the owners their development approvals without public debate!! There is mention of tourist commercial uses and possible development of 600 homes! Where are the environmental impacts addressed? What are the impacts of such development on the Highway 29/Sonoma Highway? How about a new signal at Stanly Lane? What are the growth inducing impacts on the areas between Stanly Ranch and the south side of the main part of Napa? None of these issues are addressed in the EIR.

35.1

I understand the City's desire for the development of a new resort such that hotel taxes can be collected. I feel comfortable with a small resort on Stanly Ranch with perhaps 100 to 200 rooms as long as the rest of the property is devoted to agricultural and wine related uses. The net fiscal impact would probably be more beneficial than the potentially huge project. The hotel would have to be well designed to minimize impacts but it's possible to do it without destroying the rest of the site. Skip the 600 homes. They will destroy the property. The EIR does not address the impacts of these homes on this land. Either put the property back into a study area or reduce the potential development potential. Let's preserve a beautiful property as part of the entrance into Napa and the Napa Valley. Don't let it be destroyed, especially without public debate.

Thank you for the opportunity to comment.

Sincerely yours,

Ray Valeri





JUDY IRVIN, A.I.A.

ARCHITECTure  
& PLANning

GENERAL PLAN COMMUNICATION # 36

December 2, 1996

John Yost, Director  
Planning Department  
City of Napa  
P.O. Box 660  
Napa, CA 94559-0660

DEC

RE: Draft General Plan and EIR

Dear Mr Yost;

I have reviewed both the Draft Policy Document and EIR for the City of Napa General Plan update and I wish to compliment you and your staff for a job well done. The Policy Document is readable, comprehensive and will give our future leaders a defensible framework for future decision making. The policies defined in this document combined with enlightened leadership will allow our community to develop and keep Napa a good place to live.

The following comments relate to both documents and are intended to expand the dialog. I have focused on the Central Planning Unit and related factors; I am sure that other observers will comment on other areas.

#### Chapter 1: Land Use

The listed development potential for the Central Napa Planning Area does not address the very high number of illegal, substandard and flood prone units in this area. Densities range as high as 300 du's/ acre which is far in excess of the recommended densities with many units in basements within the flood plain. The City has a Non-Conforming Use Ordinance which states that it is the policy of the City to phase out these substandard housing units and to bring densities into conformance with the Zoning Ordinance. No listing of the existing underlying density is included in either document. Nor are policies designed to encourage Transfers of Densities to more

36.1



1130 First Street  
Suite 226  
Napa, CA 94559  
707/224-3228

6



appropriate receiver sites. If the policies for Planning Unit #8 and the Historic Resources Element are implemented and the existing ordinances enforced, a net reduction in dwelling units should result.

In addition, the Neighborhood Character analysis states that the Historic or Traditional neighborhoods include most of the very low income housing and small rental units. Policies to "retain neighborhood character" are thinly veiled attempts to keep all of the low income housing in the historic neighborhoods and preserve the affluent suburbs from perceived threats to their economic status.

#### Recommendations:

1. Include policies to encourage density transfers.
2. Include policies to encourage affordable housing dispersal throughout the City and to ensure a preponderance of owner occupied housing in all planning units.
3. Existing and historic FAR's exceed the limit of 2.00 imposed for the downtown. An increase in the FAR to 3.00 or 3.50 would create massing and urban form similar to the historic urban form and should be encouraged.

#### Chapter 3: Transportation

Traffic is probably the most insidious threat to historic resources and neighborhood character. When traffic increases, uses slowly change from owner occupied, single family housing to rentals, then to multifamily and finally to commercial. Offices and businesses, which then increase traffic congestion even more, remove housing from the inventory and remove the life from the street.

Walkability decreases in direct proportion to traffic increases and the quality of life is eroded. The traffic policies do not effectively address nor mitigate the adverse impacts to historic resources. Numerous areas within the





historic urban core have been adjudged to be eligible for the National Register of Historic Places and a therefore afforded the protection of CEQA.

36.6

#### Recommendations:

1. Add a category to Table 3-2: Street and Highway Classification System for Historic Roadways. None of the roadways of the historic road grid in Planning Unit #8 meets the design criteria for either Arterials nor Collectors. High traffic volumes combined with the housing densities and the demographics of the area create a severe threat to public safety.

36.7

2. According to the EIR, projected traffic volumes on Coombs will be close to 10,000 vehicles per day, the First and Second Street couple will carry close to 26,000 vehicles per day while Lincoln will carry only 7,500 vehicles. Given that Lincoln meets the design criteria of a four lane arterial capable of carrying significantly higher volumes while the other two roadways are historic residential streets originally designed for horses and buggies, Lincoln Avenue should be designated the gateway to the downtown. Through traffic should be vigorously discouraged within the historic neighborhoods.

36.8

#### Chapter 5: Parks and Recreation

This element, which was developed in advance of the General Plan, is internally inconsistent. There are no policies to address the significant lack of parks and open spaces available to the very high population in Planning Unit #8. The large open spaces on the periphery of the City are not accessible to low income people who do not have access to automobiles nor to children and the elderly.

36.9

During flood control project meetings, the narrow strip of land along the river has been frequently mentioned as a possible local contribution to the project without identifying alternative possibilities for acquisition. I recognize that few sites within Planning Unit #8 meet the

JUDY IRVIN, A.I.A.

ARCHITECTure  
& PLANning



34.9

parkland acquisition requirements. But since this area has the highest densities without any play spaces except the streets and those are increasingly dangerous, this serious deficit should be addressed in the plan.

36.10

This element also does not include modifications in the flood control strategy developed earlier this year. Significant open spaces might evolve from strategies to protect and enhance the flood plain. Or, if the costs of the flood control project are not accepted by the community, alternative strategies such as moving housing away from areas subject to frequent flooding might be required. In either event, significant open spaces in close proximity to the high populations in the Central Planning Unit would be provided and should be addressed.

#### Chapter 6: Historic Resources

36.11

For the record, the EIR incorrectly equates the Onasatis and the Coast Miwok. The Onasatis are most probably the first people in California. I understand that a 12,000 year old archaeological site in Lake County has been acquired and sites of similar age in the Napa Valley are probable. Kroeber indicates that the city center was most probably occupied by a Coast Miwok group at the time of contact. The east side of the river was occupied by the Patwin and the north side near Las Trancas was Wappo or Onasatis.

Given that this valley is probably the most significant archaeological area in the western region, we need to be particularly vigilant in protecting this resource for the future.

Good luck in sorting all of this out.

  
Judy Irvin, A.I.A.

1130 First Street  
Suite 226  
Napa, CA 94559  
707/224-3228

December 2, 1996

City of Napa  
955 School Street  
Napa, Ca 94559

John Yost  
Director of Planning

Dear Mr. Yost:

This letter is in answer to the request by the City of Napa for comments on the updated General Plan. Having been a member of the Citizens Advisory Committee (CAC) for the review and updating the City's 1982 and 1986 General plan, it is felt that it is important that all the members of that Committee should supply written comments on the final draft of the document. Therefore, the following comments are meant to express my personal observations and understanding of the intent of the changes recommended by the Committee when it was disbanded. Moreover, several of my comments pertain to the events that have transpired after the CAC ceased to exist. Because of the diversity of experience and background of the members of the Committee, members of CAC need to be interviewed for their comments even though the members do not follow up with written information.

The Consensus developed by the CAC was the defining of Neighborhoods and neighborhood character plus the added constraints of housing types (Typeology) within the defined neighborhoods. This concept was adopted to avoid the constant acrimonious hearing process that usually followed a construction proposal in an "in-fill" area. The CAC wanted to be certain that this concept was followed and could not be changed without full disclosure and notification to the complete neighborhood. This would not only be part of the General Plan but of commensurate City ordinances that bring to bear the "Police" powers of the City. I believe that the Neighborhood Character and Typeology were meant to be enforced rigorously and the Council and City staff would be constrained in any attempt to abridge that concept without being subject to formal long term hearing process. Further, there should be recognition of the fact that a significant change in one neighborhood would be interpreted as a change in the overall concept. In other words requested changes would be handled as a very serious manner with public participation. Page 17 should be reworded to reflect the serious aspects of making changes to the Neighborhood Character and Typeology concept.

37.1





## LAND USE

37.2 | A significant land use geographical area that is in need of a **SPECIFIC PLAN** is the Central Planning Area #8 and Soscol Planning area #9. These areas are dramatically impacted by the Coalitions Living River Flood Plan and the Center for Wine Food and Arts. Furthermore, there are several parcels owned by the City and County. This Specific plan should integrate the Flood Plan, Trails, Center for Wine Food and Arts and the Expo. An alternative would be to designate the Wine Food and Arts Cultural Center as a separate land use. Failure to meet this need will lead to uncertainties by merchants, private enterprise and transportation. When the flood plan is implemented, there will be major ecological, environmental and economic impacts affecting the property owners and City/ County governments. **THIS IS NOT A MIXED USE (MU) AREA DESIGNATION.** It will need a special Land Use designation.

### Central Planning Area #8

37.3 | There are 48 Buildings that have been designated Seismically Impaired. For public safety, these buildings need to be upgraded to meet the required building codes. It would be worthwhile to offer the property owners an alternative which would allow rebuilding to allow for residential housing on the 2nd and third floors. The CAC considered allowing apartments and condominiums in the Central Business District. More people living in the downtown area would certainly enhance the area if the housing was designed and constructed to integrate architecturally with the theme of 1880 to 1930. Designate it DCR—Downtown Commercial Residential.

37.4 | The Wine Food and Arts Cultural Center should be designated for a separate Land Use and Planning Area Covering the area now considered by the EIR.

37.5 | The Flood Way (Flood Evacuation Area) should have a separate planning area that corresponds with the Coalitions Living River Plan. Because this Area would overlap other planning areas, a study should be made to determine a logical boundary for that area. Land use in the evacuation area would be very highly restricted for safety reasons. Furthermore, commercialization in this area would require specific building codes which would be more restrictive than other general land use designations. I don't believe we should use the excuse that we may never have a flood plan as the problem will remain in Napa until flooding problems have been mitigated in some manner.

37.6 | Residential "fill-in" should not allow "flag lots" to be developed unless there are absolutely no other alternatives. The Police Department and Fire Department are opposed to these sub-developments.

Resort plans, such as the Stanley Ranch, should require a supply of housing that will meet the needs of permanent employees. Many employees will require low income housing and Napa currently has a shortage.

37.7

All fill-in projects, singularly or multiples, should receive individual public notice to all residents in the designated Neighborhood areas not just those living within a small radius distance of the project.

37.8

## **TRANSPORTATION**

The transportation section should include a plan for future housing development as every new development needs public transportation service.

37.9

Bus transportation should be more fully integrated with the School District bus program. More effort needs to be devoted to making the system more efficient and less dependent of subsidies. Fare box revenues are too low for sustaining the system.

37.10

The Railroad is a major resource and more encouragement should be applied to increasing the use as a major source of transportation between Napa and Vallejo. It is necessary to reduce the traffic load on Highway 29. See page 9 second paragraph right hand column.

37.11

Page 3-7. Soscol Avenue needs realignment in the Central and Soscol planning areas. The flood plan has changed the relationship of Soscol Ave and the River. Furthermore, Highway #121 should be changed to Soscol Ave. and not remain on the Silverado Trail. The highway should go through the central area of Napa.

37.12

## **ENVIRONMENTAL ISSUES**

There should be a separate section that covers all the environmental issues pertaining to the various sections of the General Plan. More specificity would alleviate much of the confusion relating to development planning and encourage more participation in the process.

37.13

The Clean Cities program is an important element in the solution to Air Pollution. Currently the Napa City and County are participating in this important program and it should be included in the General Plan.

37.14


There should be an ECONOMICS SECTION in the General Plan that would establish an ongoing evaluation of each new development and change in the demographics of both the City and County. It is important to anticipate change and the rate of change taking place.

37.15

## Detail Comments

- 37.16
1. Page 14 last paragraph- next to last sentence--this General Plan.
  2. Page 1-3--LINDA VISTA PLANNING AREA- The Linda Vista Planning Area is located in the Northwestern quadrant of the City?

It is important that the residents of Napa understand the General Plan and to relate it to their concerns about the future of the City and County. Having been a member of the CAC, it became apparent that it was necessary to prepare a document that could be easily read and used by individuals and groups that wish to participate in the 20 year development of the community.

  
John Clifton  
21 Lemon Court  
Napa, CA 94558  
252-7069





PETE WILSON  
GOVERNOR

# State of California

## GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO 95814



LEE GRISSOM  
DIRECTOR

GENERAL PLAN COMMUNICATION # 38

November 18, 1996

JOHN YOST  
CITY OF NAPA  
1600 FIRST STREET  
NAPA, CA 94559

Subject: CITY OF NAPA GENERAL PLAN UPDATE SCH #: 95033060

Dear JOHN YOST:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

38.1

Please call at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

ANTERO A. RIVASPLATA  
Chief, State Clearinghouse

# NOTICE OF COMPLETION

Mail to: Office of Planning and Research, 1400 Tenth Street, Room 121, Sacramento, CA 95814 (916) 445-0613

## Project Title: CITY OF NAPA GENERAL PLAN AND DRAFT EIR

Lead Agency: City of Napa Contact Person: John Yost, Planning Director

Street Address: 1600 First St. Phone: (707) 257-9530

City: Napa Zip: 94559 County: Napa

### Project Location:

County: Napa City/Nearest Community: City of Napa

Cross Streets: Hwys 29, 121, 12, 221 Zip Code: 94558 & 9 Total Acres: 18.2 sq. mi.

Assessor's Parcel No. Napa County Books 1, 2, 3, 4, 5, 6, 7, 35, 36, 38, 39, 41, 42, 43, 44, 45, 46, 47, 49, 50, 52

Within 2 Miles: State Hwy #: HWY 29, 121, 12 & 221 Waterways: Napa River

Airports: Napa County Airport Railways: Napa Valley Wine Train Schools: Napa Valley Unified School Dist.

### Document Type:

CEQA: ☐ NOP ☐ Supplement/Subsequent NEPA: ☐ NOI Other: ☐ Joint Document  
☐ Early Cons ☐ EIR (Prior SCH No.) ☐ EA ☐ Final Document  
☐ Neg Dec ☐ Other ☐ Draft EIS ☐ Other  
☒ Draft EIR SCH# 95-03-3060 ☐ FONSI

### Local Action Type:

☒ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation  
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment  
☐ General Plan Element ☐ Planned Unit Development ☐ Land Division ☐ Coastal Permit  
☐ Community Plan ☐ Site Plan ☐ Other

### Development Type:

(Below as disclosed in General Plan) (Below as disclosed in General Plan)

Plan)

• Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_ • Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  
• Office: Sq. ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ • Transportation: Type \_\_\_\_\_  
• Commercial: Sq. ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ • Mining: Mineral \_\_\_\_\_  
• Industrial: Sq. ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_ • Power: Type \_\_\_\_\_ Watts \_\_\_\_\_  
• Educational \_\_\_\_\_ • Waste Treatment: Type \_\_\_\_\_  
• Recreational \_\_\_\_\_ • Hazardous Waste: Type \_\_\_\_\_  
• Other: Per required content of General Plan

### Project Issues Discussed in Document:

• Aesthetic/Visual • Flood Plain/Flooding • Schools/Universities • Water Quality  
• Agricultural Land • Forest Land/Fire Hazard • Septic Systems • Water Supply/Groundwater  
• Air Quality • Geologic/Seismic • Sewer Capacity • Wetland/Riparian  
• Archeological/Historical • Minerals • Soil Erosion/Compaction/Grading • Wildlife  
☐ Coastal Zone • Noise • Solid Waste • Growth Inducing  
• Drainage/Absorption • Population/Housing Balance • Toxic/Hazardous • Landuse  
• Economic/Jobs • Public Services/Facilities • Traffic/Circulation • Cumulative Effects  
☐ Fiscal • Recreation/Parks • Vegetation • Other

Present Land Use/Zoning/General Plan Use: Urban Use including Residential, Commercial, Industrial, Recreation, Education, Health Facilities, Government and Administrative, Roads and other infrastructure.

**Project Description:** A comprehensive update of the City of Napa's 1982 General Plan. The Draft General Plan consists of two documents, the Policy Document and the Background Report. The Background Report provides supporting information on existing conditions for both the Policy Document and the EIR. The Policy Document establishes policies and programs to guide Napa's development through the year 2020 organized into 8 elements: Land Use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources and Health and Safety. The EIR examines the environmental consequences that may occur from development or other activity that could result from the implementation of the General Plan. The Draft EIR has concluded that the Draft General Plan Policies serve as mitigations for all identified impacts.

State Clearinghouse Contact: Ms. Angel Howell  
(916) 445-0613

State Review Began: 10-3-96

Dept. Review to Agency 11-12

Agency Rev to SCH 11-15

SCH COMPLIANCE 11-18

Please note SCH Number on all Comments

Please forward late comments directly to the Lead Agency

AQMD/APCD (Resources: 10-15)

### Project Sent to the following State Agencies

☒ Resources State/Consumer Sves  
☐ Boating General Services  
☐ Coastal Comm Cal/EPA  
☐ Coastal Consv ☒ ARB  
☐ Colorado Rvr Bd ☒ CA Waste Mgmt Bd  
☐ Conservation ☐ SWRCB: Grants  
☒ Fish & Game # 3 ☐ SWRCB: Delta  
☐ Delta Protection Commission ☒ SWRCB: Wtr Quality  
☒ Forestry ☐ SWRCB: Wtr Rights  
☒ Parks & Rec/OHP ☒ Reg. WQCB # 2  
☐ Reclamation ☐ DTSC/CTC  
☒ BCDC  
☒ DWR  
☐ OES Yth/Adlt Corrections  
☐ Bus Transp Hous Corrections  
☐ Aeronautics Independent Comm  
☒ CHP Energy Comm  
☒ Caltrans # 4 ☒ NAHC  
☒ Trans Planning ☐ PUC  
☒ Housing & Devel Santa Mn Mtns  
☐ Health & Welfare ☒ State Lands Comm  
☐ Dept. of Health Tahoe Rgl Plan  
☐ Medical Waste Other:

**DRAFT GENERAL PLAN COMMENTS  
RECEIVED AFTER 12/2/96**







GENERAL PLAN COMMUNICATION #39

# NAPA COUNTY LOCAL AGENCY FORMATION COMMISSION

1195 THIRD STREET, ROOM 310 · NAPA, CALIFORNIA 94559  
VOICE 707/253-4805 FAX 707/253-4176

CHARLES WILSON  
Executive Officer

*Rec'd 12/23/96*

December 18, 1996

Mr. John Yost, Director  
City of Napa Planning Department  
P.O. Box 660  
Napa, CA 94559

Subject: Commission Review of the Draft City of Napa General Plan

Dear Mr. Yost:

The Napa County Local Agency Formation Commission, at its December 11, 1996 meeting, reviewed the Draft City of Napa General Plan and EIR, and concurred with the Executive Officer's recommendation to postpone further review pending final actions on the draft documents by the City of Napa Planning Commission. Following adoption of the Planning Commission's recommendation to the City Council, the Commission would appreciate your appearance at a future LAFCO meeting to present a brief discussion and overview of the City's General Plan goals and policies as they pertain to the expansion of the Rural Urban Limit line (RUL) as noted in the General Plan and EIR documents. In this regard, I would appreciate receiving copies of the Planning Commission's agendas and staff reports on the draft documents, and a copy of the Planning Commission's recommendation to the City Council.

39.1

Very truly yours,

Charles Wilson  
Executive Officer

cc: Chairman John Brown and Members of the Commission  
Margaret Woodbury, LAFCO Counsel  
Deborah Faaborg, General Plan Project Manager







JAN 1997

January 6, 1997

GENERAL PLAN COMMUNICATION #40

General Plan Policy Department  
City of Napa  
955 School Street  
Napa, CA 94559

Attention: Mr. John Yost, Director of Planning

Dear John:

I wish to add my comments to others you have received concerning the new General Plan.

We are all concerned with revitalizing our Downtown area. Mayor Solomon and other city leaders visited San Antonio and their Riverwalk for suggestions on how Napa could create a similar National attraction. Proper design of the Flood Control project in the area between the Hatt Building and the First Street bridge would accomplish the first part of a Riverwalk in the center of Napa. A wide plaza on the East side of the Napa River and a smaller plaza on the West side would give us the nucleus of a Riverwalk and allow the floodwaters to go through the center of the City. This area should be zoned Tourist Commercial. The walk would be at the high tide elevation and would flood during a winter storm. Permanent fixtures would not be allowed on the plaza and would have to be removed before flood periods.

40.1

The river area used to have wharves, fishing, commercial shipping and private river activities. We should bring it back by constructing a wharf area as part of the Riverwalk with concrete and steel pilings so the flood waters can go over and under the wharves without impeding the flow. The retaining walls at the East end of the plaza can be aesthetically designed with stone and concrete. Tourist commercial businesses can be established behind this wall.

Veterans Park can be better utilized for public and social events and entertainment. Temporary commercial activities could be permitted on the Riverwalk so it would not be necessary to block Main Street and Third Street.

The Council should reconsider its decision on First Street. First Street should be one way entering Napa, 2nd Street should be one way leaving Napa. Third Street would continue to be 2 way and directional signs would encourage its use to reach Highway 29.

40.2

General Plan Policy Document, City of Napa  
Attention: Mr. John Yost  
Page two

40.3 | Moving Soscol to McKinstry/Burnell Streets should be considered if Cal Trans will pay for the bridge and Right of Way.

Thank you for the opportunity to express my concerns.

Sincerely,

A handwritten signature in cursive script, reading "Vincent DeDomenico".

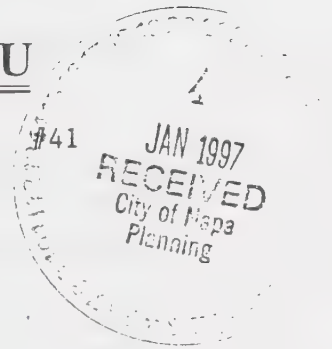
Vincent DeDomenico  
President

VD:ma



# NAPA COUNTY FARM BUREAU

GENERAL PLAN COMMUNICATION #41



January 16, 1997

The Honorable Brad Wagenknecht, Mayor  
Napa City Council  
955 School Street  
Napa, CA 94559

Dear Mayor Wagenknecht:

On behalf of the Napa County Farm Bureau I would like to register our concern regarding the proposal by the City of Napa to expand its rural urban limit line. The City's draft General Plan indicates that the City is committed to upholding the current RUL and no expansion is planned. However, the draft EIR proposes incorporating an additional 440 acres of land currently located outside of the City's RUL.

Expansion of the RUL is contrary to the stated objectives of the City's General Plan and slow growth policies. It also fails to reflect the desire of the Napa citizenry for orderly growth (51% of City voters approved Measure A and 63% of City voters approved Measure J, indicating that City and County residents alike favor slow growth and the preservation of agricultural and open space lands). Additionally, obvious plans to annex an agricultural parcel clearly violates both City and County objectives to protect our valuable agricultural and open space lands.

41.1

Additionally, we believe the draft EIR is inadequate for the following reasons:

1. The environmental impacts of the proposal to urbanize the Stanly Ranch area (Napa Planning Area # 12) are not adequately analyzed. Urbanization of the area through the development of 600 residential units would mean a loss of agricultural and open space lands. Additionally, the potential for increased traffic as a result of the Stanly Ranch development is not evaluated or mitigated.
2. The City plans to incorporate into the RUL, a parcel designated "Agricultural Resource" (east of Big Ranch Road). This signals the City's intent to urbanize agricultural land, a dramatic departure from current City policies.
3. Both development of the Stanly Ranch area, as well as the agricultural area east of Big Ranch Road are growth inducing. There is no analysis of the impact these developments would have on the surrounding environment or the effect upon the policies regarding agriculture and open space outlined in the County General Plan.

41.2

41.3

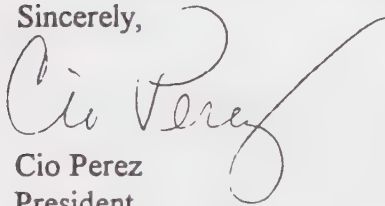
41.4



- 41.5
4. Water availability is not sufficiently addressed. The City indicates that adequate water supplies will be in place by the year 2012. How will the city supply needed water to these new areas of development between now and 2012?
- 41.6
5. In the City's addendum #1, General Plan Draft Policy Document, the City suggests including a five acre parcel in the RUL on the northeast corner of Trancas Street and Silverado Trail. The proposed GP designation would be TC - Tourist Commercial. The draft EIR does not assess the potential environmental impacts of commercialization of this area (i.e. how the project will affect neighboring agriculture).

I appreciate the opportunity to comment regarding the City's draft EIR and General Plan. I hope you will address our concerns and bring both documents into sync with the City's stated goal to preserve the RUL and maintain a policy of slow and orderly growth.

Sincerely,



Cio Perez  
President

cc: John Yost, Planning Director, City of Napa

4032 Wisteria Way

Napa, CA 94558

February 6, 1997

FEB 11 1997

GENERAL PLAN COMMUNICATION #42

Dear John,

I would like to thank you and Deborah for the time you spent with me yesterday answering my many questions. You both are always so patient and courteous.

I had one other thought that I want to share with you. You may recall my request to see a subdivision that was built at 9 units per net acre. Would it be possible to list in the new General Plan residential projects and their locations that have been built in Napa at 2, 3, 4, 5, 6, 7, 8, 9, 10, 15, 16, 20, 30, 40 units per NET acre? It would be helpful to have this information listed in Chapter I "Land Use" and to have several examples of each density. These examples would encompass all the residential densities mentioned on pages 1-42 thru 1-45 of the August 16, 1996 Draft Policy Document.

This would enable the general public, Planning Commissioners and City Councilmembers to better visualize the proposed density of any future residential project and its compatibility to the character and density of the existing neighborhood.

I know it is your desire to make this new General Plan the best that it can be and I thought this suggestion would help to contribute to this goal.

Sincerely,

*Louise Clerici*

Louise Clerici

42.1





# NAPA CITY PLANNING COMMISSION MEETING

## October 17, 1996

### Minutes Excerpt

#### **Agenda Item:** *ENVISION NAPA 2020, DRAFT GENERAL PLAN - DEIR Hearing*

DEIR, *ENVISION NAPA 2020, DRAFT GENERAL PLAN* - Public hearing on the Draft Environmental Impact Report (DEIR) which has been completed for the City of Napa Draft General Plan, *Envision Napa 2020*. The Draft EIR has been prepared to evaluate the potential impacts that could result from implementation of the policies and programs of the Draft General Plan, which is a comprehensive update of the 1982 General Plan that will guide decisions concerning Napa's development to the year 2020. The Draft General Plan policies and programs are organized into nine elements: Land Use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources, Health and Safety and Administration. The EIR provides environmental analysis under the topics of Land Use, Transportation, Community Services and Utilities, Cultural Resources, Visual Resources, Biological Resources, Geology (Soils and Seismicity), Hydrology, Air Quality, Noise, Public Health and Safety. The Draft EIR finds that the Draft General Plan serves as a mitigation program for any potential impacts that may result from development enabled by the General Plan. After completion of the 45 day DEIR public review period, all comments and responses will be incorporated into a Final EIR which will be considered along with the General Plan at future hearings before the Planning Commission and City Council.

Deborah Faaborg, General Plan Project Manager, provided a brief summary of the EIR review process.

Rod Jeung, Project Manager, Ogden Environmental, explained that an Environmental Impact Report (EIR) is usually prepared to disclose the potential significant environmental impacts associated with a particular project. The Altamura Subdivision or Ridgeview Sports Fields and Community Park Development are very specific projects and the impacts that are identified, and the EIR that's prepared, are actually very straight forward and project specific. Commissioners are often asked to review plans with specific development details. The EIR consultant or staff can review specific project features and determine whether the project is compatible with the

surrounding environment. When presented with project specifics of a development plan, one can estimate how many automobile trips are going to enter or leave the site and determine whether that will create an impact for the pedestrians for the traffic intersections nearby. The information that is contained in a project level site plan allows one to estimate how much water or sewage might be generated from that project. The impact of grading, whether there will be any significant geotechnical problems, the type of erosion that may occur and resulting drainage patterns. With a specific project application, the types of impacts can be determined in detail and specific mitigation measures can be developed for that project. As such, EIR's or Negative Declarations on specific project applications can be very detailed because they have more detailed information.

All that information, all those details, all those plans go out the window when you are talking about a General Plan EIR. In contrast to a project specific EIR, a General Plan EIR is different in that it is more general. The General Plan is the "project" for EIR review. It presents broad policies, it talks about areas that are proposed for development, it doesn't mandate anything, or propose the details of construction; it doesn't prescribe a particular size of development or location; it doesn't talk about how many units or types of units or the setback that is appropriate for a residential development that might be occurring in a particular planning area. What it does do is begin to talk very generally about the intensity and location of development. With the General Plan EIR, you aren't really sure when or where the development is

going to occur, precisely and specifically. Your not going to know when it's going to occur because we are dealing with a 25 year time frame and you don't know how intense the development is actually going to be, you just have general guidelines. So given all these questions, how does one go about actually preparing an environmental document that fulfills the CEQA requirements and fully discloses the potential significant impact associated with something as general as the General Plan. There are three things that we have to pay particular attention to.

First, to get an idea where the development is going to occur, you have to take a look at the Rural Urban Limit boundary. That will tell us the physical limits of development within the City of Napa. Within that RUL, you don't know what's going to be developed except to look at what's in the Plan. The General Plan map gives us an idea of the intensity and location of residential, commercial, industrial and other land uses that will be accommodated within the RUL. The Plan describes the categories of land use but it does not specify the type of residential, whether condo or apartment or senior citizen complex; and, it does not tell you whether it's going to be a commercial business that provides services to local or regional patrons or one that will attract more traffic. We have only the information in the General Plan to rely on. We have to rely on the growth projections that are contained in the General Plan document to anticipate the possible quantity, intensity and timing of development. The General Plan currently explains population forecast for the year 2020 of about 81,000. It describes the number of housing units that might be accommodated and the approximate number of jobs that might be anticipated over the course of the next 25 years. In order to do an analysis, we use those particular quantified numbers in order to get an estimate of the range of impacts.

Finally, the Policy Document contains policy statements and implementation programs. Those programs, policies and diagrams can, in and of themselves, have certain environmental impacts associated with them. We take a look at those to see whether they might result in environmental impacts. For example, when the City prepared the Parks and Recreation Element EIR, there were proposals for certain community parks. The consultant took into consideration things associated with community parks, such as ball fields, lighting and high activity. They considered what community parks might be proposed for the city to compare those against maps that have already been delineated to show sensitive resources such as creeks, etc. and to make a general assessment of whether a park for the general area might have the potential to encroach into any habitats. Mitigations or conditions were developed to minimize those adverse effects; however, the mitigations were at a more general level related to facility location rather than specific design.

Normally, one would think with a General Plan that's proposing an extension of urban development and a population that's going from about 65,000 to 80,000 would have a host of different types of environmental impacts.

Additional growth could imply extending the limits of development up to some of the surrounding foothills; perhaps exposing that development to slope failure or wildland fire hazards. Additional growth could mean there's increased traffic on many of the local streets and on some of the major thoroughfares. The additional growth could also mean there is greater damage that might occur with a flood event on the Napa River. Those are all different types of impacts that one would anticipate when you talk about development and growth over a course of the next 25 years. The single reason that these impacts are not considered significant impacts in the EIR is because the plan, as it was being formulated, recognized these impacts and hazards and proposes policies that act as mitigation measures to avoid or minimize them. Using the example of the potential extension of development into the foothills and the concern of geotechnical hazards, slope failure and wildland fire hazards; there are policies and implementation programs that are now in the draft General Plan, specifically in Chapter 8, Health and Safety, that require adequate fire protection measures, clearing of vegetation, maintenance of access, adherence to specific geological reports. All of those policies and implementation programs function as mitigation measures in the General Plan EIR. If the City General Plan did not contain these policies and programs, they would be required by the EIR in order to minimize the impacts. The same thing goes for traffic. If the City is anticipated to grow from 65,000 to approximately 80,000, traffic is going to increase on all of the major



thoroughfares. The draft General Plan contains a list of improvement in Chapter 3, Transportation, along with a series of policies that are intended to minimize traffic impacts. These include policies that encourage bicycle, pedestrian and transit use and other modes of travel and ways to minimize safety issues where you have driveways backing up to collectors.

The final example is flood hazards. When you encourage more land development as part of your strategy along the Napa River, there is the potential to increase the flood hazard to those particular residences and businesses. The current Draft General Plan, Health and Safety Element, talks about continued participation in the Federal Flood Insurance Program. It talks about coordination with the U. S. Army Corp in order to come up with an environmentally acceptable and financially acceptable solution. And it talks about adherence to building standards and requiring construction at elevations above the flood levels. Again, all of these policies and programs that are in the Draft General Plan and serve to mitigate the effects that might otherwise occur.

As a result of this very conscious effort to recognize and mitigate potential effects of the plan, plus the fact that the City already has existing standard mitigation measures in Policy Resolution No. 27, the EIR concludes that no significant environmental impacts will result from the adoption of the implementation of the General Plan. The Summary Section in the EIR lists 40 potential impacts that could occur as a result of implementing the General Plan and then lists all the policies and implementation programs that serve to mitigate the effects. This concludes his remarks.

**Chair Mulford** opened the public hearing.

**Harold Kelly**, 3450 Meadowbrook Drive, noted the late hour and the few number of people in the audience for a review of a most important document and urged the Commission to take preliminary comments tonight and continue the public comment period to a future meeting at an early hour. He suggested the public hearing on the DEIR be scheduled near the end of the 45 day public review period.

**Muriel Fagiani**, 905 Caymus Street, presented documents for the public record which were left behind by people who were prepared to speak tonight. She noted the late hour and suggested the public hearing be continued. She believes that the way the EIR has been developed, with separately bound documents, is a mistake. The document does not contain a map of the 1940 or 1986 flood to show the extent of flooding; that is a mistake. The earthquake map shows the area proposed for the American Center for Wine Food and the Arts, the Oxbow; is subject to strong ground movement. She believes that liberally included in the documents are little gems which will someday be drawn out to point up the fact that something can be approved because it was addressed in the EIR. Policy Resolution 27 has Special Conditions of Approval required of developers; however, it is a resolution which can be changed without public hearings. It can be changed by the City Council at its pleasure. There is a suggestion that the Commission has ordinances and regulations that might have to be changed and will be adjusted to this General Plan. She noted that a number of things have to be addressed and the late hour is not the time to do it. She again urged the Commission to continue the public hearing.

A.1

A.2

**Louise Clerici**, 4032 Wisteria Way, supported the request for a continuance to an earlier hour.

FOLLOWING BRIEF DISCUSSION, **COMMISSIONER HOVER** MOVED, SECONDED BY  
**COMMISSIONER CUNEY**, TO CONTINUE THE PUBLIC HEARING TO OCTOBER 24,  
1996 AT 7:00 P.M.

Motion carried, 5 ayes.





**PLANNING COMMISSION  
REGULAR MEETING MINUTES**

City Council Chambers  
City Hall  
955 School Street, Napa, California

October 24, 1996

**COMMISSIONERS**

**PRESENT:** Cuney, Kampton, Mulford, Hover and Krider

**ABSENT:** None

**STAFF:** Planning Department: John Yost, Deborah Faaborg, Virginia Tygart  
Public Works Department: John Draper

**MEETING TO ORDER:** 7:00 p.m. by Chair Mulford. Mr. Mulford explained that he was recovering from a problem with his voice and turned the meeting over to Vice-Chair Krider.

**CITIZEN COMMENTS**

**Muriel Fagiani**, 905 Caymus Street, expressed concern about the lack of citizen participation at this evening's public hearing on the Draft Environmental Impact Report (DEIR) for the City of Napa Draft General Plan, *Envision Napa 2020*. She suggested that a legal notice in the classified section did not attract attention and encouraged the Commission to contact the Napa Valley Register Editor with a request that the newspaper publish General Plan articles that will provide information to the public and encourage citizen participation.

**COMMUNICATIONS & PETITIONS**

**Associate Planner Deborah Faaborg** noted receipt of the following:

- A:** October 15, 1996 letter from **Charles Bogue, President, Napa Chamber of Commerce**, expressing support for the Draft General Plan and also requesting that the City commit resources to the preparation and eventual inclusion of an Economic Element when considering approval of the General Plan.
- B:** October 17, 1996 letter (presented at the October 17, 1996 meeting) from **Judith Sears, Friends of the Napa River**. The letter suggests that the details of the Napa Urban Waterfront Restoration Plan be incorporated into the General Plan and that an appendix be added to the General Plan that consolidates all of the policies related to the Napa River Watershed. It also expresses concern that there isn't sufficient detail in the Plan related to stormwater management and suggests that future development contain runoff to predevelopment rates. They request that riparian enhancement be addressed in the Conservation Element. **Ms. Faaborg** described the attachments to this Communication.
- C:** October 15, 1996 letter from **Charles Bogue, President, Napa Chamber of Commerce**, to the Mayor and City Council transmitting Communication A to the City Council and reiterating the request that an Economic Element be considered.

**CONTINUED ITEMS**

DEIR, *ENVISION NAPA 2020*, DRAFT GENERAL PLAN - Public hearing, continued from October 17, 1996, on the Draft Environmental Impact Report (DEIR) which has been completed for the City of Napa Draft General Plan, *Envision Napa 2020*. The Draft EIR has been prepared to evaluate the potential impacts that could result from implementation of the policies and programs of the Draft General Plan ( a comprehensive update of the 1982 General Plan) that will guide decisions concerning Napa's development to the year 2020. The Draft General Plan policies and programs are organized into nine elements: Land use, Housing, Transportation, Community Services, Parks and Recreation, Historic Preservation, Natural Resources, Health and Safety and Administration. The DEIR provides environmental analysis under the topics of Land Use, Transportation, Community Services and Utilities, Cultural resources, Visual resources, Biological Resources, Geology (Soils and Seismicity), Hydrology, Air Quality, Noise, Public Health and Safety. The Draft EIR finds that the Draft General Plan serves as a mitigation program for any potential impacts that may result from development enabled by the General Plan. After completion of the 45 day DEIR public review period (October 4 - November 18, 1996), all comments and responses will be incorporated into a Final EIR which will be considered along with the General Plan at future hearings before the Planning Commission and City Council.

Associate Planner Deborah Faaborg noted that this item was continued from October 17, 1996 due to the late hour. She reviewed the General Plan and DEIR process and described the purpose of tonight's public hearing.

Vice Chair Krider reopened the public hearing for the Draft EIR.

Chris Malan, 2945 Atlas Peak Road, stated that the Draft EIR claims that the Draft Policy Document is a self mitigating document and that the Draft Policy Document must be comprehensive in planning for all territories. With that in mind, she offered her concerns.

As a matter of process, it is awkward to comment on the DEIR before commenting on the Draft Policy Document. The Draft Policy Document is lacking in content.

81 The DEIR, Pg. S-10, No. 4, Land Use, "Development associated with the Draft General Plan would result in the conversion of existing agricultural uses and prime soils within the City's RUL to urban uses," states "insignificant". When applied to the Stanly Ranch, she believed this would be a significant impact. The impact of development of significant agricultural land would be "significant", not "insignificant". Also regarding the Stanly Ranch, the DEIR makes little to no comment regarding the environmental impact of the 600 residential homes and 109,314 square feet of commercial or industrial use shown on Table 1-2 of the Policy Document. The DEIR made little comment that the Draft Policy Document gives language regarding the Specific Plan for Stanly Ranch on Page 1-7 of the Draft Policy Document, yet there is no mention of a specific plan under Land Use Designations on Pg. 1-28. In looking through the DEIR, she found little to no comment on the Stanly Ranch. Her understanding is that Stanly Ranch is currently a study area and there is concern that the Draft Policy Document has provided land use designations for the Stanly Ranch. The DEIR is dramatically lacking in its review of the Stanly Ranch and there needs to be a full public review and hearing as to the fate of the Stanly Ranch. The Draft Policy Document should not be assuming that a Specific Plan will meet certain, predetermined criteria. The Stanly Ranch is currently designated a study area and the Draft Policy Document has predetermined a Specific Plan with 600 homes. This is a huge environmental impact and the DEIR does not address this.

82 Referring to the DEIR, Pg. S-11, Transportation, Ms. Malan stated that because the Draft Policy Document does not adequately implement mass transit, there are no mitigations. Referring to the Draft Policy Document, Pg. 3-28, Transportation Policy T-10.4, she noted that the DEIR is supposed to take us into the 21st century and we should be developing a mass transit system that alleviates pressure to build roads, create more cement and use up



land. She noted that there is no mitigation measure for the replacement of the Imola Bridge for future roadway improvement No. 17 on Pg. 3.3-7 in the DEIR.

B3

Referring to Pg. 3.7-7 of the DEIR, she stated that there is no mention of endangered species such as the hardhead minnow, the stickleback and the bluegill that inhabit the Napa River. The Draft Policy Document is lacking in its implementation of wildlife corridors and riparian corridors along the Napa River. Therefore, there are no mitigation measures in the DEIR to preserve what areas remain. There should be clear maps in the Draft Policy Document that show riparian corridors with setbacks.

B4

B5

If the Draft Policy Document is to take us into the 21st century with progressive and innovative ideas, she believes that these points should be considered.

**Richard Nieman**, 3180 Mt. Veeder Road, spoke of concerns regarding how the 900 acre Stanly Ranch has been presented in the Draft General Plan. It appears that no comprehensive environmental review, such as the one required for the Big Ranch Road Specific Plan, is called for. He referred to the description of the development concept for the Stanly Ranch included in the Policy Document. He stated that the Stanly Ranch is designated agricultural land in the center of very sensitive wetlands and has extensive river frontage and that runoff and flooding issues alone should require a comprehensive EIR not to mention the impact of the fertilizers and pesticides from the golf course on the marsh and river systems. Add traffic, habitat issues and water table issues and he believes it is necessary to require a comprehensive EIR before the next step happens. He believes the General Plan should include an agricultural zone and an open space zone and should require the Stanly Ranch to go through a specific plan approval process with a comprehensive environmental review.

C1

**Muriel Fagiani**, 905 Caymus Street, took issue with the way that the General Plan has been organized. She stated that a General Plan is usually one document and asked why the City of Napa Draft General Plan has three separate volumes which have to be integrated by the public. She argued that the Commission should not be taking comments on the DEIR while the Commission is in the process of holding study sessions on the General Plan. She asked the location of the Redevelopment Agency section in the document. She argued that redevelopment has physical and land use implications that are not addressed in the DEIR. She asked for a response to why the General Plan is presented in three volumes, why a Redevelopment Agency section was omitted and why public hearings on the DEIR are being held while the Planning Commission is in the process of holding study sessions.

D1

D2

**Dorothy Glaros**, 1157 Austin Way, Napa, CA 94558, stated for the record that she was a member of the General Plan Citizens Advisory Committee (CAC). She noted that the Errata #1 added specific numbers for rental units, low income families and home ownership to the General Plan; one section specifically states numbers of affordable housing units that the City of Napa will provide. She explained that the CAC was unable to make a determination regarding the specific number of units and is concerned that if a specific number of units is included in the General Plan, it may push a property to high density units when the property is not appropriate for high density. She emphasized the need to look at those specific numbers and also at the land remaining in the City of Napa for high density units.

E1

**Commissioner Hover** expressed a concern that so few citizens attended the DEIR hearings. A lengthy discussion ensued regarding community outreach to encourage more citizen participation. Suggestions were offered and discussed.

**Chair Mulford** offered the following comments on the DEIR:

He found it confusing for the City to be described in square miles, acres, present and projected population and was also described in terms of housing units, present and projected housing units and present and projected commercial and industrial.

F1



F2 The DEIR sets good standards for new development as far as maintaining visual quality, historic districts, neighborhood compatibility, etc., but there are numerous areas where the DEIR should be addressing how we deal with existing development. He believes that if the DEIR is going to address environmental issues of new development, the continued existence of some types of either residential, commercial or industrial that are incompatible with neighborhoods should also be covered. He sees a number of areas in dealing with neighborhoods and neighborhood compatibility with commercial and residential where existing does not get addressed. He believes that in most areas where it talks about new development, existing can also be addressed.

F3 Regarding Reduced Growth Alternative 2 in the DEIR, he understands there are a lot of reasons why the proposed project is a preferred project. Referring to Pg. 5-11 and 5-12, he believes that the arguments made for why preferred Alternative 2 is not a viable alternative are weak. He believes that the arguments related to neighborhoods and the issues of the growth would have to be dealt with in the proposed project would not have to be dealt with with preferred Alternative 2. The reduced traffic noise, air pollution and neighborhood protection could also be used to support Alternative 2. Regarding the comment in the summary of Pg. 5-12 of the DEIR, "...it does not provide any compelling benefits", he can see the compelling benefits for Alternative 2 would be the reduced traffic, noise and air pollution because it is not projecting as large of a growth. Regarding the comment, "...would be less successful in protecting the neighborhood character", he would include the neighborhood topology and proposed policies in the Plan in order to provide this benefit with Alternative 2.

G1 **Commissioner Hover** would like the DEIR to name the exact species that live on all sites within the City as opposed to a more general reference. If we are going to protect habitats and species, we need to know exactly what species we are trying to protect and exactly what property they live on.

Noting that the Commission has expressed a desire for additional community outreach, **Commissioner Cuney** moved, seconded by **Commissioner Hover**, to continue the public hearing on the DEIR to November 7, 1996. Following discussion, the motion and second to continue the public hearing to November 7, 1996 were withdrawn and the Commission requested staff include a paragraph at the beginning of each Planning Commission agenda as a reminder to the citizens of Napa written comments on the DEIR could be submitted until November 18, 1996. The public hearing on the DEIR was closed. Following additional discussion, **Commissioner Cuney** moved, seconded by **Commissioner Mulford**, that during the adjourned study session, the Commission discuss strategies on community outreach with a goal to enhance community participation. Motion carried, 5 ayes.

## ADJOURNMENT

The Commission adjourned at 9:00 p.m. to the Committee Room for a Study Session on the Draft General Plan "Envision Napa 2020". Staff discussion focused on the Transportation and Community Services components of the plan and was followed by a general discussion between staff and Commissioners regarding organization and content of the General Plan documents.

The next regularly scheduled meeting is November 7, 1996.

James Mulford, Chair  
NAPA CITY PLANNING COMMISSION

John R. Yost, Secretary  
NAPA CITY PLANNING COMMISSION

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